



DEPOSITION OF RENEE SCHROEDER BUTTS

Date: December 18, 2014

Case: RENEE SCHROEDER v. CALEB GILBERT

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION

RENEE SCHROEDER,)
)
Plaintiff,) CIVIL ACTION FILE
)
) NO. 4:14-CV-130-HLM
vs.)
)
CALEB GILBERT, in his)
individual capacity,)
)
Defendant.)

Deposition of
RENEE SCHROEDER BUTTS

Thursday, December 18, 2014
11:00 a.m.

Filipovits Law Firm
2900 Chamblee Tucker Road
Building 1
Atlanta, Georgia

MARY K. CALDWELL, CSR, B-1325

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RENEE SCHROEDER vs. CALEB GILBERT

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18 ALSO PRESENT:

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20 - - -

21

22

23

24

25

(Pursuant to Article 10.B of the Rules and
Regulations of the Board of Court Reporting of the
Judicial Council of Georgia, the court reporter
disclosure statement is tendered at the end of the
transcript.)

DEPOSITION OF RENEE SCHROEDER BUTTS 12/18/2014
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1 P R O C E E D I N G S:

2 MS. COWAN: This will be the deposition
3 of Renee Schroeder, taken in the case of
4 Renee Schroeder versus Caleb Gilbert. This
5 deposition will be taken for all purposes
6 available under the Federal Rules and for
7 purposes of cross-examination.

8 Are you agreeable to reserving
9 objections except as to form and
10 responsiveness until the time of trial?

11 MR. FILIPOVITS: Yes.

12 MS. COWAN: Okay. And do you want
13 Ms. Schroeder to read and sign her
14 deposition?

15 MR. FILIPOVITS: Let me get back with
16 you on that after we're done.

17 MS. COWAN: You want to wait 'til the
18 end?

19 MR. FILIPOVITS: Yeah.

20 MS. COWAN: Okay, sounds good.

21 Will you please swear Ms. Schroeder in.

22 RENEE SCHROEDER BUTTS,
23 having been first duly sworn, was examined and
24 testified as follows:

25 / / /

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1 EXAMINATION

2 BY MS. COWAN:

3 Q Okay. Ms. Schroeder, thank you for being
4 here. We discussed earlier if you need any breaks
5 or anything like that, just interrupt me and let me
6 know --

7 A Okay.

8 Q -- and we'll take one.

9 A Thank you. I'm gonna try and make it
10 through all of this.

11 Q Okay. I'm sure you can, too.

12 Can you state your full name for me,
13 please.

14 A **Renee Nicole Schroeder.**

15 Q Okay. And any other names that you go by?

16 A **Renee Butts.**

17 Q Okay. And my understanding is that you
18 are currently Renee Butts; correct?

19 A **Correct.**

20 Q Okay. Do you have a middle name as Renee
21 Butts? Are you Renee Nicole Butts?

22 A **Yes.**

23 Q Okay.

24 A **Nicole still.**

25 Q Okay. And what is your date of birth?

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1 **A** **10/23/1982.**

2 **Q** Okay. And your current address?

3 **A** **5 Pinewood Drive. And --**

4 **Q** What -- it's 5 Pinewood Drive?

5 **A** **Yes.**

6 **Q** Okay.

7 **A** **And Pinewood is one word.**

8 **Q** Okay.

9 **A** **And that's in Laflin, but sometimes it's**

10 **listed as Wilkes-Barre. It's confusing.**

11 **Q** Okay.

12 **A** **L-A-F-L-I-N (spelling).**

13 **Q** Okay.

14 **A** **P.A.**

15 **Q** Pennsylvania?

16 **A** **Yeah.**

17 **Q** And can you spell Wilkes-Barre?

18 **A** **W-I-L-K-E-S, hyphen, B-A-R-R-E (spelling).**

19 **Q** Okay. All right.

20 **A** **And sometimes it's hyphenated, sometimes**

21 **it's not. It's --**

22 **Q** Okay. But also in Pennsylvania; right?

23 **A** **Yes.**

24 **Q** Okay.

25 **A** **Yes, Laflin and Wilkes-Barre. Laflin is**

1 **considered part of Wilkes-Barre. But sometimes when**
2 **I'm ordering online or whatever or going through the**
3 **DMV, I put Wilkes-Barre. It depends.**

4 Q Okay. Is Wilkes-Barre a bigger town?

5 A **Yes.**

6 Q Okay. Can you tell me a little bit about
7 your educational background?

8 A **I went to Wyoming Seminary private school**
9 **through ninth grade. For kindergarten I went to**
10 **Apple Tree, and for nursery I went to Magic Years.**
11 **Sorry. That was in -- that was not in the right**
12 **order. I have --**

13 Q That's good that you can remember all
14 that.

15 A **From tenth grade through twelfth grade, I**
16 **switched to public school --**

17 Q Okay.

18 A **-- and graduated in the class of 2000.**

19 Q Okay. What school did you go to in tenth
20 grade?

21 A **James M. Coughlin High School.**

22 Q Okay. All right.

23 A **And do you need the spelling for Coughlin?**

24 Q That'd probably be good for the record, if
25 you don't mind.

1 **A C-O-U-G-H-L-I-N (spelling).**

2 **Q Okay. Wyoming Seminary, is that a --**
3 **like, a boarding-school kind of place or?**

4 **A The upper school, the high school where I**
5 **went in ninth grade, people do board there.**

6 **Q Okay.**

7 **A But it was local for me.**

8 **Q Okay.**

9 **A So I didn't need to board.**

10 **Q Okay. And then you changed to go to**
11 **Coughlin High School after that?**

12 **A Yes.**

13 **Q Okay. And what about college education?**

14 **A College? I got my Bachelor's degree in**
15 **English writing from King's College, and that was**
16 **received in 2004.**

17 **Q Okay.**

18 **A And I attained my Master's in creative**
19 **writing I believe it was in 2008.**

20 **Q 2008?**

21 **A Yeah.**

22 **Q Okay.**

23 **A From Wilkes University. Also while**
24 **attending -- while taking the Master's program, I**
25 **took courses to teach secondary education and**

1 high-school English.

2 Q Okay.

3 A And I completed student teaching, et
4 cetera.

5 Other little things in my educational
6 background: I completed the Dale Carnegie business
7 course --

8 Q Okay.

9 A -- at the age of 18. I'm not sure what
10 year that would be. It was 2000.

11 Q Okay.

12 A Around there. I believe, to the best of
13 my ability, it was around 2000, yeah.

14 Q Where did you do your student teaching?

15 A Pittston Area High School, P-I-T-T-S-T-O-N
16 (spelling).

17 Q Okay. S-T-O-N (spelling)? Okay.

18 Q And was it at a public school? Is that a
19 public school?

20 A Yes.

21 Q And in Pennsylvania, to teach high-school
22 English in a public school, do you have to have a --
23 an education degree?

24 A You do, yeah.

25 Q Okay.

1 **A You have to complete the Praxis test --**

2 **Q Okay.**

3 **A -- and attain certification.**

4 **Q Okay. Do you have to have a degree in**
5 **secondary education, I guess is my question?**

6 **A No.**

7 **Q Okay.**

8 **A You just have to take -- there's a certain**
9 **amount of required courses that took me about a year**
10 **and a half, two years to complete.**

11 **Q Gotcha.**

12 **A I had the other English courses while I**
13 **got my Bachelor's degree.**

14 **Q Okay. And so then you have to take the**
15 **Praxis and --**

16 **A You have to take the Praxis I's and Praxis**
17 **II's.**

18 **Q Okay. Okay. Did you take the Praxis in**
19 **Pennsylvania?**

20 **A I took the Praxis I --**

21 **Q Okay.**

22 **A -- but not the Praxis II because I went to**
23 **go work at the courthouse, and you have to pay to**
24 **put a certification on hold.**

25 **Q Okay.**

1 **A So, anyway, that's all.**

2 **Q So if you wanted to teach again in**
3 Pennsylvania, you would have to take I and II again?

4 **A I would, just the second.**

5 **Q Okay.**

6 **A Just the Praxis II. And then I'd have to**
7 go through a background check and be approved by the
8 state board of educators.

9 **Q Okay.**

10 **A I believe that's all.**

11 **Q And did you -- did you pass the Praxis I?**

12 **A Yes.**

13 **Q Okay. And when did you take the Praxis I?**

14 **A I can't remember. Possibly 2007/2008.**

15 **Q Okay.**

16 **A In that vicinity.**

17 **Q Okay.**

18 **A I can't remember, a long time ago.**

19 **Q No. It's hard. You don't normally**
20 prepare to remember the date you did everything,
21 so --

22 **A Yeah.**

23 **Q -- that's understandable.**

24 **A I'll give you the ballparks as best I can.**

25 **Q Yeah, yeah. Okay. Any other schools**

1 you've attended, coursework you've taken that we
2 haven't discussed?

3 **A I used to do some summer for -- while I**
4 **was at Seminary, I did summer camp for acting.**

5 **Q Okay.**

6 **A I did some acting courses.**

7 **Q And that was in which you were a student**
8 **doing --**

9 **A Yes.**

10 **Q Okay.**

11 **A That was when I was a student at Seminary,**
12 **and typing courses.**

13 **Q Okay.**

14 **A Any coursework? I believe that's it. If**
15 **I think of anything else, I'll let you know.**

16 **Q Okay. I seem to recall on the --**

17 **Have you reviewed the video of the traffic**
18 **stop in this case?**

19 **A No, no.**

20 **Q Okay. I seem to recall in that video that**
21 **you mentioned maybe going to school in -- starting**
22 **school in Florida at some point and then coming**
23 **home?**

24 **A Yes.**

25 **Q Okay. What school did you go to in**

1 Florida?

2 A I went to Eckerd College. I only went for
3 the freshman -- the freshman --

4 Q Just, like, the first --

5 A -- orientation --

6 Q Oh, okay.

7 A -- in the Summer, and then I stopped
8 before, like, real -- before real classes started.

9 Q Okay.

10 A I didn't like being away from home.

11 Q Okay.

12 A We were, like, roaming in the bugs.

13 Q So you were accepted there and planning to
14 go there and then changed your mind once you got
15 there?

16 A Yes. I was going to be a creative-writing
17 major there.

18 Q Okay. And so then you came home and went
19 to King's College? Is that what happened?

20 A Yes.

21 Q Okay. So that would've been in, like,
22 '01, is that about right, when you went to Eckerd?

23 A 2000.

24 Q Okay.

25 A I graduated in the Summer of 2000, so --

1 Q Okay.

2 A -- August of 2000 I headed to Eckerd,
3 early August, I believe.

4 Q Okay. Okay. And in some of your
5 discovery responses I got some of this information,
6 but I want to talk about it a little more, about
7 your employment history.

8 A Sure.

9 Q Cee Kay Auto Parts, it says that you
10 worked there from '01 through '04.

11 Is that while you were in college that you
12 worked there?

13 A Yes.

14 Q And is that a family business?

15 A Yes.

16 Q Okay.

17 A And also occasionally in high school.

18 Q Okay.

19 A It's one of those things, go back to
20 working for the family or, you know.

21 Q Uh-huh (affirmative). Now, who in your
22 family owns Cee Kay Auto Parts?

23 A Initially my father, but now my father and
24 my sisters. To the best of my knowledge, we all
25 have some ownership in it. I'm not sure if my dad

1 still has any, actually.

2 Q Okay.

3 A And I believe my Aunt Ginger has a stake
4 in it, too. I just know I own four percent.

5 Q Four percent?

6 A Yes.

7 Q Okay. And when was Cee --

8 And is it C-E-E (spelling)?

9 A K-A-Y (spelling).

10 Q Okay.

11 A Sometimes there's a dash. Sometimes
12 there's not.

13 Q Okay.

14 A It's like Wilkes-Barre. Yes.

15 Q Is there --

16 Is that related to somebody's name or
17 where did Cee Kay come from?

18 A My two older sisters --

19 Q Okay.

20 A -- Cindy and Kim.

21 Q Okay. And when was Cee Kay Auto Parts
22 started?

23 A I believe in the '70's.

24 Q Okay.

25 A It was before I was born.

1 Q And it was by your father?

2 A Initially his father started it, but I'm
3 pretty sure the name was different because Cindy and
4 Kim weren't born then, I don't believe.

5 Q Right.

6 A But it was a little corner store, and my
7 dad took it and built it up into what it is today.

8 Q Okay. And what is it today? How many
9 locations are there?

10 A Five locations.

11 Q Okay. And where are those?

12 A There's one in Moosic, M-O-O-S-I-C
13 (spelling).

14 Q Okay.

15 A Let's see. That's store A.

16 Store B is in Scranton, S-C-R-A-N-T-O-N
17 (spelling).

18 Q Uh-huh (affirmative).

19 A Store C is in Kingston, K-I-N-G-S-T-O-N
20 (spelling).

21 Q Thank you.

22 A No problem. Store D is Pittston,
23 P-I-T-T-S-T-O-N (spelling).

24 And store E is in Wilkes-Barre, which you
25 already have the spelling for.

1 Q Okay.

2 A **And they're all in Pennsylvania.**

3 Q Okay. And what kind of auto --

4 Is it, like, an Advance Auto Parts store?

5 What can you compare it to that I would know about
6 maybe?

7 A **It's like an Advance, but there is -- the
8 main store in Moosic has a large warehouse --**

9 Q Okay.

10 A **-- where most of the parts are kept. The
11 Moosic store is the headquarters, and there's also a
12 tire department there and there's a service center.**

13 Q Okay.

14 A **And then they do deliveries to the other
15 stores. The other locations are smaller.**

16 Q Okay. And which location did you work at?

17 A **Moosic.**

18 Q Moosic? And is that the one that was the
19 main location?

20 A **Yes.**

21 Q Is that -- okay.

22 And what kind of work did you do there?

23 A **Oh, whatever they needed me to do:
24 sometimes cleaning shelves, sometimes stocking
25 shelves, sometimes inventory, answering the phones.**

1 I didn't actually help customers with auto parts
2 because I didn't know. What else? Oh. Data entry.
3 Q Okay.
4 A Computer work.
5 Q Okay.
6 A And I helped organize the car show with
7 them in a local car club --
8 Q Okay.
9 A -- for --
10 Q You mentioned your sisters.
11 Q How many siblings do you have?
12 A Four half-sisters.
13 Q Okay. And do they all live in
14 Pennsylvania?
15 A No.
16 Q Okay. What are their names?
17 A The oldest is Cindy.
18 Q Okay.
19 A Cindy Landolt.
20 Q Okay. Can you spell that last name?
21 A L-A-N-D-O-L-T (spelling).
22 Q Okay.
23 A And there's Kim --
24 Q Okay.
25 A -- Herron. H-E-R-R-O-N (spelling) I

1 believe is the way you spell -- wow. I feel like a
2 bad sister.

3 Q That's okay.

4 A And then there's Jeanine --

5 Q Okay.

6 A -- Butts, B-U-T-T-S (spelling), and
7 J-E-A-N-I-N-E (spelling).

8 Q Okay.

9 A Then there is Joy, and her last name is
10 Bomba, B-O-M-B-A (spelling).

11 Q Okay.

12 A And she lives in New York City.

13 Q Okay.

14 A I'm not sure specifically what part of New
15 York City.

16 Q Okay. Where does Jeanine Butts live?

17 A Pennsylvania.

18 Q Okay. And Kim Herron, is she in
19 Pennsylvania?

20 A Yes.

21 Q And Cindy Landolt, is she in Pennsylvania?

22 A Yes.

23 Q Okay. What does Cindy do for a living?

24 A She runs the company.

25 Q Okay. And is she married?

1 **A I don't think she's gotten a divorce yet.**

2 **Q**Okay. What does her soon-to-be ex-husband

3 do for a living?

4 **A He worked at Cee Kay.**

5 **Q**Okay. Is he gonna keep doing that?

6 **A No.**

7 **Q**Okay.

8 **A He no longer works there.**

9 **Q**Okay. Do you know what he does now for a

10 living?

11 **A No.**

12 **Q**Okay. And Kim Herron, what does she do

13 for a living?

14 **A She works at Cee Kay.**

15 **Q**Okay.

16 **A She does accounts-payable sort of things**

17 **with the finances.**

18 **Q**Okay. And what about her --

19 **Q**Is she married?

20 **A Yes.**

21 **Q**And what does her husband do?

22 **A I believe Ronnie still works for Cee Kay.**

23 **Q**Okay. And Jeanine Butts, what does she do

24 for a living?

25 **A She works at Cee Kay.**

1 Q Okay. Does her husband work for Cee Kay
2 also or is she not married?

3 A **Jeanine is not married.**

4 Q Okay. Sorry. I should have gathered that
5 from her name.

6 And Joy Bomba, what does she do?

7 A **I'm not supposed to say that she was let
8 go from Time Warner.**

9 Q Okay.

10 A **So she's starting a new job, but that's a
11 big family secret.**

12 Q Okay.

13 A **So I'd really prefer that not get to my
14 mother because I'm sworn to secrecy on that.**

15 Q Okay. And is she married?

16 A **Yes.**

17 Q Okay. And what does her husband do?

18 A **I'm not sure what Joe does. He was
19 bartending last time I checked, and he was --**

20 Q Okay.

21 A **He was an aspiring film writer.**

22 Q Okay.

23 A **He was doing little webisode things.**

24 Q Okay.

25 A **We met in my creative-writing class.**

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1 Q You met her --
2 A **Husband, yeah.**
3 Q -- husband? That's interesting. Okay.
4 A **Yeah.**
5 Q And how old generally are each of your
6 sisters? I know you probably don't have it exactly
7 in your mind.
8 A **Oh, gosh.**
9 Q But are you the youngest or?
10 A **I'm the youngest.**
11 Q Okay.
12 A **Let's see.**
13 Q And you don't have to -- just knowing that
14 you're the youngest answers my question enough.
15 That's okay. Okay.
16 Okay. So you worked for Cee Kay during
17 school, and then it looks like you went to work for
18 State Workers' Insurance Fund; is that right?
19 A **Yes.**
20 Q Okay. And what did you do for State
21 Workers' Insurance Fund?
22 A **I ended up -- let's see. Sorry. My**
23 **brain's a little slow this morning. Let me --**
24 Q That's okay.
25 A **I reviewed stacks of documentation to make**

1 sure they were all belonging to the same persons --

2 Q Okay.

3 A -- and to make sure they were properly
4 labeled if they had medical records in them. I
5 proofed others' work to make sure they had done the
6 same.

7 Q Okay.

8 A There was some data entry and some
9 answering phones, also scanning these documents. I
10 believe that about covers it. I don't think I would
11 do any other responsibilities, but most of the time
12 I spent correcting other people's errors.

13 Q Okay. And that was while you were in
14 school for your Master's? Did I get that right?

15 A No. I left there to go for my Master's --

16 Q Okay.

17 A -- and my teaching classes.

18 Q Gotcha.

19 A It was not what I wanted to be doing.

20 Q Okay. So you finished King's College and
21 then went to work for State Workers' Insurance Fund?
22 Do I have that right?

23 A Yes.

24 Q Okay. And then decided to go back to
25 school to get your Master's?

1 **A Yes.**

2 **Q Okay.**

3 **A And, actually, I worked at a data-entry**
4 **place that I forgot about, too.**

5 **Q Okay. What was that called? Do you**
6 **remember?**

7 **A Liberty, I think. This is back when I was**
8 **18.**

9 **Q Okay.**

10 **A Briefly between when I left Eckerd and**
11 **before I started at King's.**

12 **Q Oh, this is -- okay. So this is before**
13 **you started college?**

14 **A Yes.**

15 **Q Gotcha.**

16 **A And then when I was in high school, I**
17 **worked at another data-entry place that I don't know**
18 **the name of.**

19 **Q Okay.**

20 **A But I could make my own hours. It was**
21 **convenient.**

22 **Q Yeah. Okay.**

23 **A And there were, like, little stints at,**
24 **like, J.C. Penney's and Bon-Ton --**

25 **Q Okay.**

1 **A -- retail work.**

2 **Q And then I've got that you went to work**
3 **for Luzerne County.**

4 **Am I saying Luzerne County right?**

5 **A Yes.**

6 **Q Okay. And what did you do for Luzerne**
7 **County?**

8 **A I was the sole executive assistant of**
9 **Luzerne County Commissioner Stephen A. Urban.**

10 **Q Okay. And what were your job**
11 **responsibilities as his executive assistant?**

12 **A Filling in for him when he couldn't be**
13 **there.**

14 **Q Okay.**

15 **A I would have to represent him at**
16 **meetings --**

17 **Q Okay.**

18 **A -- et cetera. For an example would be I**
19 **had to sit in front -- on a panel with other elected**
20 **officials about the water-supply contamination or I**
21 **would have to attend different functions, various**
22 **dinners and network with people or various events.**
23 **I would also be in the office and have to -- I would**
24 **go through the county funds --**

25 **Q Uh-huh (affirmative).**

1 A -- and see where everything was spent and
2 if I saw anything that I thought was questionable,
3 look it up in the system and see what it was --

4 Q Okay.

5 A -- and just handling various complaints
6 about the county, sometimes speaking to members of
7 the press.

8 Q Did you have to answer questions on his
9 behalf --

10 A **Yes.**

11 Q -- at some of those meetings?

12 A **Yes.**

13 Q Okay.

14 A I was generally prepared and told what to
15 say. If I didn't know, I'll ask Steve and I will
16 get back to you.

17 Q Sure. Did you ever --

18 Did you have to attend the county
19 commission meetings?

20 A Unfortunately, I was usually left holding
21 down the office. The other assistants --

22 Q Okay.

23 A -- went. So if any constituents showed up
24 who were angry, it was just me.

25 Q Okay. Did you have to deal with angry

1 constituents on a regular basis?

2 **A Yes.**

3 Q Okay. And you worked there for a year, it
4 looks like?

5 **A Yes.**

6 Q Okay. And I have in the discovery
7 responses that you left for health issues following
8 a car accident?

9 **A Yes.**

10 Q Okay. Tell me a little about that.

11 **A I was on my way to work, and I was hungry.**
12 **I usually don't eat in the mornings. I was starved.**

13 Q Uh-huh (affirmative).

14 **A I stopped at McDonald's. And I know they**
15 **say fast food's bad for you, but it was really bad**
16 **for me.**

17 Q Okay.

18 **A I went a little bit of a different route,**
19 **and I was stopped behind another car at a red light**
20 **because I was trying to make a right, but I was**
21 **stuck at the red light because there was another car**
22 **going straight in front of me.**

23 Q Uh-huh (affirmative).

24 **A And I'd been stopped there for a while**
25 **because I remember I really wanted the food. A van**

1 **plowed into me.**

2 **Q** Um. Into the back of your car?

3 **A** **Yes.**

4 **Q** What kind of car were you driving?

5 **A** **Chevy Cobalt.**

6 **Q** Okay.

7 **A** **Fairly small vehicle.**

8 **Q** Yeah, yeah.

9 **A** **They were in a large van.**

10 **Q** And were you hurt?

11 **A** **Yes.**

12 **Q** Okay. Did you have to go to the hospital
13 from the scene?

14 **A** **No. It was some muscular damage --**

15 **Q** Okay.

16 **A** **-- whiplash, because I had my hand on the**
17 **steering wheel, and I was pushed kind of --**

18 **Q** Okay.

19 **A** **Very awkward.**

20 **Q** Okay.

21 **A** **It wasn't very bad until the next day. I**
22 **was starting to get a little sore after, and the**
23 **next day I went to get it checked out.**

24 **Q** Did you go to the hospital?

25 **A** **Yes.**

1 Q Okay.

2 A I did go. And, actually, I went the same
3 day. I either went the same day or the next to the
4 hospital. I'm sorry. This was in '09, so it is a
5 little fuzzy.

6 Q Okay. And what happened after that? Did
7 you have to go do some physical therapy? Did you
8 have to have surgery? What kind of medical
9 treatment did you have to --

10 A No surgery. I had to do some chiropractic
11 work.

12 Q Okay.

13 A Well, somebody had to do some chiropractic
14 work on me.

15 Q Sure.

16 A I had to kind of keep myself comfortable.
17 I had a neck brace for a bit. I couldn't lift my
18 arm up to drive properly, so I was unable to
19 drive --

20 Q Uh-huh (affirmative).

21 A -- for a while and couldn't sit in a chair
22 straight up for very long periods of time.

23 Q Okay.

24 A I still can't, honestly. I get -- start
25 to get sore.

1 Q Okay.

2 A Whenever writing I use a chaise now.

3 Q Okay.

4 A And that's why I -- and it was a three to
5 six-month recovery, and county commissioners only
6 get one assistant.

7 Q Uh-huh (affirmative).

8 A I didn't want to leave Steve without
9 having anybody to help.

10 Q Uh-huh (affirmative).

11 A So I feel he didn't like me and resigned.

12 Q Okay. So what did you do when you
13 resigned?

14 A I recovered.

15 Q Okay.

16 A And then I wasn't sure what I was going to
17 do, and I was approached about running for state
18 representative and asked about -- I was at lunch --
19 I was taken for a meal some -- at some point in time
20 and asked about -- or was it lunch? I was taken for
21 a meal some -- at some point in time and asked about
22 running for state representative.

23 Q Okay. How long did you recover? How long
24 did you take to recover? Is that how --

25 You left in '09? Was it --

1 A I was starting to get back to normal maybe
2 around April, like, not completely recovered but
3 able to be in a car without being in pain, like --

4 Q Uh-huh (affirmative).

5 A -- able to drive more comfortably, still
6 couldn't do the office-chair thing for a long period
7 of time.

8 Q Okay. So April of '09?

9 A Yeah.

10 Q Okay. Okay. And then when were you
11 approached about running for office?

12 A It was probably April.

13 Q Okay.

14 A It was probably April, but don't quote me
15 on that. It might have been April, it might have
16 been May.

17 Q Okay.

18 A But I had got the palm cards and
19 everything made, so I think it might have been
20 April.

21 Q Who approached you?

22 A It was P.J. Best who had ran against the
23 incumbent as a write-in, and I had tried to help
24 him.

25 Q So he was someone that you knew --

1 **A Yes.**

2 **Q**-- previously?

3 **A Yes.** He was -- I was a Republican and he
4 was a democrat. But they wanted to replace the
5 incumbent, and they thought they needed somebody to
6 run on the Republican side, so --

7 **Q**Okay.

8 **A**-- they asked me, went to -- then there
9 was another party I attended that night to network
10 with people who had been interested.

11 **Q**Did you work on P.J. Best's campaign or
12 how had you helped him in the past?

13 **A**I worked the polls for P.J. I made P.J.
14 Best -- I made very silly rhymes outside of the
15 polls and made him laugh.

16 **Q**Okay.

17 **A**Want a candidate who's better than all the
18 rest, vote for P.J. Best. Out with the old, in with
19 the new, P.J. Best is the candidate for you.

20 **Q**There ya go.

21 **A**It was really silly.

22 **Q**Okay. So you were campaigning for him --

23 **A****Yes.**

24 **Q**-- essentially --

25 **A****Yes.**

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1 Q -- outside of polling places?

2 A Yes.

3 Q Okay. And had you expressed an interest
4 to P.J. Best in running for office in the past?

5 A I was already a Republican committee
6 person for the third district in Luzerne County.

7 Q Okay. What did that involve as the
8 Republican committee person?

9 A I would have to go to various meetings and
10 vote on different things if we held events or, you
11 know, attend events for local candidates. If they
12 needed help working the polls for those candidates,
13 I would go.

14 They did try to run me -- before I took
15 the -- I believe it was before I took the job with
16 Steve Urban, they tried to run me for third district
17 chair.

18 Q Okay.

19 A But I lost that election narrowly --

20 Q Okay.

21 A -- I think by six to eight votes.

22 Q What type of office would that have been
23 as third district chair?

24 A Obviously was leading the third district.

25 Q Okay.

1 **A** You have the final say in organizing some
2 events.

3 **Q** Okay.

4 **A** You know, getting people to campaign in
5 the area, keeping that active. You're the main
6 organizer. If you're somebody who's not gonna do
7 anything, if you're just somebody who just wants to
8 sit on a position, nothing's gonna go on, the
9 candidates aren't gonna get the support they need,
10 et cetera.

11 **Q** And who votes for that chairperson?

12 **A** The other committee people.

13 **Q** Okay. Okay.

14 **A** The other committee men and women from the
15 other districts -- or not from the other districts,
16 I'm sorry, but.

17 **Q** The other people within that district?

18 **A** Yes.

19 **Q** All right. Gotcha.

20 **A** The people in the third district would
21 vote for third district chair.

22 **Q** Okay. And so you ran for that and
23 narrowly lost that election?

24 **A** Yes.

25 **Q** Okay. And who were you running against in

1 that election?

2 **A I believe his name was Michael Harrison.**

3 **Q**Okay. Did you stay involved in the third
4 district after losing the chair position?

5 **A No. Michael -- was it Michael Harrison?**

6 **No. I don't think it was Michael Harrison. Oh, my**
7 **gosh. There's so many political people, I know**
8 **their names kind of jumble up.**

9 **Q**Uh-huh (affirmative). Well, that's okay.

10 **A I mean, all the guys do kind of run**
11 **together. He -- the winning side was rather -- how**
12 **can I put this? They were rather inhospitable to me**
13 **and my supporters.**

14 **Q**Gotcha. So the next time you decide to
15 run for office is when P.J. Best approaches you;
16 right?

17 **A Correct.**

18 **Q**Okay. And how did you go about getting
19 involved in running for House of Representatives?

20 **A I had to send a letter to the HRCC, the**
21 **House Republican Congression -- or Campaign**
22 **Committee. It was a congressional committee.**

23 **Q**Thank you.

24 **A Just the C's --**

25 **Q**That's okay.

1 A Well, they came to my house and they sat
2 down with me and met with me to discuss platforms,
3 what I would run for, what issues I would run on,
4 how to deal with the general public in questions.

5 I got palm cards and pens made up. I
6 frequently attended events and spoke at whatever
7 events I could.

8 Q What's a palm card?

9 THE WITNESS: Jeff, do you have the
10 palm card --

11 MR. FILIPOVITS: (Counsel shakes head
12 negatively).

13 THE WITNESS: -- that my mom brought,
14 the state representative thing?

15 MR. FILIPOVITS: Oh. Well, just
16 explain.

17 BY MS. COWAN:

18 Q Yeah. If you'll -- we can -- maybe on a
19 break we can grab it and I can look at it.

20 A **It's a card that has the basic issues --**

21 Q Okay.

22 A **-- and your picture and says --**

23 Q Gotcha.

24 A **It's what's handed out in front of the**
25 **polls.**

1 Q Put it in people's palms, huh?

2 A **Yeah.**

3 Q Okay, gotcha.

4 A **So the annoying things that people don't
5 like to get in front of the polls, but.**

6 Q Okay. So you started the process. I
7 saw -- I saw that you had made some speeches.

8 And so you actually began to run for
9 office, didn't you?

10 A **Yes.**

11 Q Okay.

12 A **I started doing speeches in 2007.**

13 Q Okay. And when was the election set for
14 that --

15 A **It would've been the 2010 election.**

16 Q Okay.

17 A **But I dropped out of the race because my
18 now ex-husband proposed.**

19 Q Okay. So you got involved in '07 with
20 aspirations of the 2010 election?

21 A **No. I just got involved in helping out
22 with different causes in 2007.**

23 Q In '07?

24 A **Yes.**

25 Q In 2010?

1 **A** **I** **2010** **I** **was** **asked** **to** **run** **for** **--**

2 **Q** **Okay.**

3 **A** **--** **state** **rep.**

4 **Q** **I** **wrote** **down** **'07** **for** **some** **reason.** **I**'**m**
5 **sorry.**

6 **A** **'07's** **when** **I** **first** **got** **involved** **in** **the** **--**

7 **Q** **Okay.**

8 **A** **--** **political** **scene.**

9 **Q** **Gotcha.** **Okay.** **And** **at** **that** **time** **you** **were**
10 **getting** **your** **Master's;** **is** **that** **--**

11 **A** **Yes.**

12 **Q** **Okay.** **Where** **were** **you** **living** **in** **2010** **when**
13 **you** **decided** **to** **run** **for** **House?**

14 **A** **I** **was** **at** **my** **mother's.**

15 **Q** **Okay.**

16 **A** **Oh,** **no.** **I** **--** **when** **I** **decided** **to** **run****,** **it**
17 **was** **'09.** **I**'**m** **sorry.**

18 **Q** **Okay.**

19 **A** **Because** **it** **was** **a** **year** **before** **the** **election.**

20 **Q** **Gotcha.**

21 **A** **I**'**m** **sorry.** **This** **is** **--**

22 **Q** **That's** **okay.** **No,** **no.** **We've** **got** **it**
23 **generally.**

24 **A** **2009.** **I** **wanted** **to** **start** **early.** **I** **was** **at**
25 **my** **mom's.**

1 Q Okay.

2 A I moved back partner. I never liked
3 living alone, so I --

4 Q Okay.

5 A -- lived with my mom and --

6 COURT REPORTER: I'm sorry.

7 BY MS. COWAN:

8 Q Yeah. If you could speak up a little bit,
9 that would be good.

10 A Started living with my mom and going to
11 run.

12 Q For office?

13 A Yeah.

14 Q Gotcha, gotcha. I found a couple of
15 blogs, and you mentioned these in your -- in your
16 discovery.

17 A I think I men -- I think I found all of
18 'em when I Googled me.

19 Q Yeah. And so I've got one that says Renee
20 Butts for State Representative, and it talks about
21 your -- kind of your platform.

22 A Yes.

23 Q Is that what you looked at as well?

24 A Yes.

25 Q Okay.

1 A This is what I found online.

2 Q Okay.

3 A All right. So, yeah. They would've
4 approached me in definitely either April or May to
5 run for this in 2009, but it was for the 2010.

6 Q Okay. I think I'll go ahead and mark this
7 one as Exhibit 1, please.

8 A Do you need this back?

9 Q That would be good. I'm just gonna put a
10 sticker on it.

11 A Okay.

12 (Thereupon, marked for identification
13 purposes, Defendant's Exhibit 1.)

14 BY MS. COWAN:

15 Q So we've marked this Gort42 blog as
16 Exhibit 1.

17 Do you know who Gort42 is?

18 A Yeah. He just started using his real name
19 on Facebook, and I can't remember it.

20 Q Okay.

21 A I've always called him Gort.

22 Q Okay.

23 A He's a very popular local blogger.

24 Luzerne County is very political.

25 Q Uh-huh (affirmative).

A So bloggers I would say have somewhat of a local celebrity status.

Q And is he a friend of yours or an acquaintance?

A He was an acquaintance.

Q Okay.

A And I believe we became more friendly just
chatting at events.

(Thereupon, marked for identification purposes, Defendant's Exhibit 2.)

BY MS. COWAN:

Q Okay. And then I think you already said this. This is Exhibit 2, and it says -- I'm sure you love the title of that -- "Renee Butts out".

But you were withdrawing from running from
House?

A Yeah. Gort said he couldn't -- Gort said
he couldn't resist, resist upon --

Q At least he talked to you about it before he used it.

A Well, no. He posted it already --

Q Okay. Never mind.

A -- and I said -- I laughed. I laughed.
I'm used to it.

Q That's good. Yeah. There's no reason to

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1 be too serious about that stuff. That's good.

2 So you withdrew because you were planning
3 to get married; is that right?

4 **A Yes.**

5 Q Okay.

6 A **And Bill didn't live in the same district**
7 **as me.**

8 Q So you were planning to move?

9 A **Yes.**

10 Q Gotcha. And Bill is William Schroeder --

11 A **Yes.**

12 Q -- Schroeder?

13 A **Yes.**

14 Q Okay.

15 A **If you hear me mention Bill, that's who**
16 **I'll be referring to.**

17 Q Okay. Okay. And how did you meet Bill?

18 A **Match.com.**

19 Q Okay.

20 A **I tried Match.com. I had some --**

21 Q Okay.

22 A **I had some notorious dating experience in**
23 **the past, so I decided to, you know, do the**
24 **pre-screen thing.**

25 Q There ya go. And did --

1 When did you first start dating Bill?

2 **A It would've been August of 2008.**

3 **Q Eight?**

4 **A Actually, I believe we might have met the**
5 **very end of July or maybe it was August. I know we**
6 **officially became a couple on August 8th, '08.**

7 **Q Okay. And where did Bill live when y'all**
8 **met?**

9 **A He lived in Drums, Pennsylvania.**

10 **Q Is that where he's from?**

11 **A No.**

12 **Q Okay. Where's he from?**

13 **A He was born and raised in Louisiana.**

14 **Q Okay.**

15 **A I'm not exactly sure which part. But when**
16 **he was in high school, they moved to Texas.**

17 **Q Okay.**

18 **A His family moved to Texas, and he actually**
19 **later moved to -- he went to school, actually, out**
20 **at Georgia Tech --**

21 **Q Okay.**

22 **A -- and then moved to Pennsylvania, our**
23 **area, for a job, which is just weird.**

24 **Q Okay.**

25 **A Nobody comes there for jobs.**

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1 Q And what is his --

2 How is he employed?

3 A **Chemical engineer.**

4 Q Okay. So were y'all married in
5 Pennsylvania?

6 A **Yes.**

7 Q And then did y'all live in Pennsylvania
8 after you were married or?

9 A **We did.**

10 Q Okay.

11 A **We did, and then we moved to North
12 Carolina.**

13 Q Okay. Where did you live in Pennsylvania
14 after you were married?

15 A **I moved in with him into Drums.**

16 Q Drums? And then what took y'all to North
17 Carolina?

18 A **Well, we both weren't thrilled with the
19 area at the time because -- well, me. If you've
20 lived somewhere all your life, you're kind of --
21 you're disenchanted with it.**

22 Q Uh-huh (affirmative).

23 A **It is a little bit of a behind-the-times
24 sort of place.**

25 Q Okay.

1 A They always joked the coal dust has never
2 cleared. And he got a job working for DSM Dyneema
3 in North Carolina. And I don't like the cold, I
4 don't like driving in snow, and I was -- I was
5 pretty okay with moving aside from -- leaving family
6 and friends.

7 Q Okay. So where in North Carolina did
8 y'all move?

9 A **Greenville.**

10 Q Okay.

11 A **It's in Pitt County, P-I-T-T (spelling)**
12 **County.**

13 Q Okay. What year did you get married?

14 A **November 21st, 2009.**

15 Q Okay. And were you employed after you
16 withdrew from running for office and then got
17 married? Were you employed in any capacity?

18 A **No.**

19 Q Okay.

20 A **He worked long hours, so I took care of**
21 **the dogs and house --**

22 Q Okay.

23 A **-- and errands and all the other fun stuff**
24 **and wrote my book.**

25 Q Okay. What kind of dogs?

1 **A Two Siberian huskies.**

2 **Q Okay.**

3 **A Vladamir and Ronald Reagan.**

4 **Q That's pretty funny. Did you call --**
5 like, if you're calling them, are you like Ronald
6 Reagan, come here, or did you call him, like, Ron?

7 **A Reagan.**

8 **Q Reagan? Okay.**

9 **A I'm sure he came campaigning with me when**
10 **he was a baby.**

11 **Q Okay. Okay. And then when y'all moved to**
12 North Carolina, same thing? You stayed at home with
13 the dogs and --

14 **A Stayed home and wrote.**

15 **Q -- wrote? Okay.**

16 **A More than that. I was dealing with all**
17 **the contractors. Our house was remodeled.**

18 **Q Okay. Did y'all remodel the home or?**

19 **A There was something in the bathroom that**
20 **needed to be fixed. There were leaky pipes. Some**
21 **stuff needed to be done in the backyard. There was**
22 **a leak in the pool liner. We had a salt-water**
23 **system put in for the pool so my hair didn't turn**
24 **green. But they had the yard ripped up for some**
25 **pipes. It was plumbing stuff. And this went on for**

1 **months after we moved there --**

2 **Q Okay.**

3 **A -- and there were people there every day.**

4 **Q Okay. And you were primarily dealing with**
5 **them on a day-to-day basis?**

6 **A Yes.**

7 **Q Okay. Okay. And you referred to the -- a**
8 **book that you were working on after y'all got**
9 **married.**

10 **Was that the book that you recently**
11 **published?**

12 **A Yes.**

13 **Q Okay. When did you start working on that**
14 **book?**

15 **A I started working on that I believe in**
16 **2010, the initial --**

17 **Q Okay.**

18 **A -- version. And it's slightly based on**
19 **something I -- my Master's thesis.**

20 **Q Okay.**

21 **A My Master's thesis was pretty terrible,**
22 **honestly, but this is -- this --**

23 **Q It must have been okay because you got**
24 **your Master's, so.**

25 **A Yeah. But they -- I started working on**

1 this in 2010, and then afterwards I had an editor
2 work with me on it for about a year sending it back
3 and forth before I was okay with sending it out to
4 get published.

5 Q Okay.

6 A Long drawn-out story. I didn't want to
7 send it with any inconsistencies.

8 Q Uh-huh (affirmative). How do you -- I
9 have no idea about this.

10 So how do you go from writing something to
11 getting it published? Because I know you can write
12 all day long and somebody may not want to publish
13 it, so.

14 A Well, you have to write down as much as
15 you possibly can the first time, and you don't worry
16 too much about writing crap because there's a delete
17 key. And then you need to get friends or someone
18 else to look at it and see what you missed. I mean,
19 this is an involved novel with a lot of twists, so
20 for me I really wanted the editor to -- an editor to
21 look at it to find inconsistencies. I got my
22 favorite author's editor. Then --

23 Q Okay. Who's your favorite author?

24 A Kresley Cole.

25 Q How do you spell that?

1 **A** **K-R-E-S-L-E-Y (spelling).**

2 **Q** Okay.

3 **A** **C-O-L-E (spelling).**

4 **Q** Okay.

5 **A** **And then after that I started sending it**

6 **out. And finally after all this stuff happened, I**

7 **finally -- one of the publishers that I was talking**

8 **to decided to take it, because once you get a hit**

9 **from a publisher, any expression of interest, you**

10 **stop sending it --**

11 **Q** Okay.

12 **A** **-- because they all talk to each other.**

13 **Q** Okay, gotcha.

14 **A** **So they initially expressed interest I**

15 **believe it was April 2013.**

16 **Q** Okay.

17 **A** **And then they decided to take it. They**

18 **decided they wanted it late August, early September**

19 **2013.**

20 **Q** Okay. And when did you start sending

21 out -- is it a --

22 **Q** You send out a manuscript? Is that what

23 you do?

24 **A** **Each --**

25 **Q** I may be using the wrong term.

1 A Each publisher's different --

2 Q Okay.

3 A -- even, I mean, in terms of formatting.
4 Sometimes they want the whole thing, and sometimes
5 they might want the first hundred pages. Sometimes
6 they want just the first ten pages. Sometimes they
7 just may want you to fill out a questionnaire and
8 they decide if they want anything after that.

9 Q Okay.

10 A I sent out a couple in November of 2012,
11 but then I stopped because of the holidays.

12 Q Uh-huh (affirmative).

13 A I don't want it to get shoved on the back
14 burner. So I really started seriously in January,
15 and I had a few near hits.

16 Q Uh-huh (affirmative).

17 A And then in April, that was when The Wild
18 Rose Press decided.

19 Q Okay.

20 A Or is it The Wild Rose Publishing? TWRP
21 decided they wanted --

22 Q Okay.

23 A -- wanted the book. They were interested
24 in it.

25 Q So you say you got a couple of near hits.

1 What does that mean? Like --

2 **A They've expressed interest and they had**
3 **other people read it in the company.**

4 **Q Okay.**

5 **A But they considered it and then decided**
6 **not to ultimately.**

7 **Q Okay. So do you get, like, a formal offer**
8 **letter of some kind when they decide that they want**
9 **to publish your book?**

10 **A Very much done for e-mail -- it's very**
11 **much done through e-mail, the initial**
12 **communications.**

13 **Q Uh-huh (affirmative).**

14 **A But I was mailed a contract --**

15 **Q Okay.**

16 **A -- that I had to sign and mail back --**

17 **Q Okay.**

18 **A -- when The Wild Rose decided to publish**
19 **the book.**

20 **Q Okay. What types of books does Kresley**
21 **Cole write?**

22 **A Fantasy romance.**

23 **Q Okay.**

24 **A A lot of humor.**

25 **Q And the contract they mailed you, was that**

1 a contract for you to have your initial book
2 published and then publish some additional books?

3 **A It's not to publish additional books, but**
4 **if I write anything in the same world --**

5 Q Okay.

6 **A -- I have to go through -- I have to give**
7 **them a chance to take it first --**

8 Q Okay.

9 **A -- before I go to somebody else.**

10 Q So it gives them an option to take your
11 books?

12 **A Yes.**

13 Q Okay.

14 **A Yeah.**

15 Q And when was the book published?

16 **A It came out September 5th of this year.**

17 Q So 2014?

18 **A Yes.**

19 Q Okay.

20 **A Somehow we actually, like -- we ordered**
21 **them on Amazon and got it before the official**
22 **release date, though, no idea how it exactly**
23 **happened, but.**

24 Q Because Amazon is so on top of delivering
25 things, I guess.

1 A I got it, like, a week in advance.

2 Q Okay. It was the Drums. So September
3 5th, 2014, it gets published.

4 Can you tell me a little bit about the
5 book, what it's about generally?

6 A It's fantasy romance. It's a mix of
7 mythology and history. It's in a world if the
8 ancient gods are real. There's -- but they're not
9 really gods. They're magical beings called fay.

10 Q Okay.

11 A They can be killed. But if they're not
12 killed, they just kind of live forever.

13 Q Okay.

14 A So there's a mix of Celtic, Norse and
15 Greco-Roman mythology thrown in.

16 Q Okay.

17 A So there's some wild parties in Asgard
18 where Apollo's there and Hecate and they're hanging
19 around with some Celtic myth characters. And I
20 tried to write the characters -- the fay is all sort
21 of, like, dysfunctional implied. The main character
22 is Freya who was raised by humans, by the Remi
23 tribe.

24 Q Okay.

25 A The Remi tribe is a Gaulic tribe, and they

1 were one of the only known tribes, possibly the only
2 known tribe, to support Rome when Rome went to war
3 against Vercingetorix who wanted to be the king of
4 Gaul.

5 Q Can you spell that for the record, the --

6 A V-E-R (spelling) --

7 Q Okay.

8 A -- C-I-N-G-E-T-O-R-I-X (spelling). He
9 wanted to -- this is real where he decided he wanted
10 to be king.

11 Q Uh-huh (affirmative).

12 A And he had the support of various -- of
13 most of the Gaulic tribes except the Remi in support
14 of Rome.

15 Q Okay.

16 A But Freya -- obviously, this is where it
17 gets really fictional -- decided she -- she sort of
18 had her parents' independence streak. She was the
19 daughter of Hecate and Woden a/k/a Odin --

20 Q Okay.

21 A -- Woden to sound a little more archaic.
22 She was secretly helping Vercingetorix's people from
23 the inside and taking some rants. She kind of came
24 off as a ditzy princess. She'd hang with the
25 soldiers and gamble and drink. Her parents had

1 tried to put manners on her and, you know, Romanize
2 her a little bit --

3 Q Uh-huh (affirmative).

4 A -- because of the Roman influence, but she
5 would have none of it. And she was in love with a
6 fictional rebel leader who worked for Vercingetorix
7 shipping things to Siegfried the Fox, who was
8 Germanic from the C-I-M-B-R-I (spelling) tribe,
9 which was pretty much defonated (sic) then, but in
10 my story he was one of few remnants. They were a
11 seafaring folk, so he -- yeah, piratey, yeah.

12 Q Okay.

13 A Really archaic kind of piratey-viking-ish
14 with OCD -- was just very OCD. His entire ship is
15 built in multiples of eight. He doesn't like odd
16 numbers. And she finds all this out because she --
17 she's kind of like -- how can I say this? -- like a
18 13-year-old Backstreet Boys concert.

19 Q Okay.

20 A She pays people for information about him,
21 and she's gotta be very careful so she's not labeled
22 as a rebel.

23 Q Okay.

24 A But she pretends to be a Rome supporter,
25 except behind the scenes she's not.

1 Q Okay.

2 A And he takes the place of her betrothed
3 because they didn't have pictures of people back
4 then. Her betrothed was also a remnant of the
5 Cimbri tribe. I think that's how it's pronounced,
6 C-I-M-B-R-I (spelling).

7 Q You know more -- you know better than me.

8 A Yeah. They -- she thinks he's a Roman
9 supporter and he thinks she's a Roman supporter.

10 Q Okay.

11 A They both think the Roman supporters
12 distrust and dislike each other, so there's some I
13 Love Lucy-esque hijinks going on here.

14 Q Okay.

15 A And she says things like, you know -- they
16 played Nevetofo [phonetic], which is an old archaic
17 game similar to Othello. And she says I'm gonna
18 slaughter you like a tribal rebel, and he just gets
19 so annoyed. Then she finds out she's the daughter
20 of Hecate and Woden raised against the -- and she
21 cannot use her magic. She has flight magic,
22 can't -- afraid of heights, things like that.

23 Q Okay. Is she a mermaid? Because I
24 know --

25 A Yes.

1 Q -- in Siren she plays --
2 A Yes. She has a water magic.
3 Q Okay.
4 A And she's water and storm magic.
5 Q What's the storm magic?
6 A Make lightening.
7 Q Oh.
8 A Lightening.
9 Q That's handy.
10 A And rain. There's a few scenes where she
11 almost burns friends to death.
12 Q Okay.
13 A She's not very coordinated.
14 Q Okay.
15 A She's kind of ditsy. There's a scene
16 where she's -- they're flying and she's afraid of
17 heights and she has wings and she's like
18 Siegfried -- the hero is like why are you closing --
19 and she's like I don't like heights, I don't like
20 heights, tell me where to go. And he keeps telling
21 her to go right because he's OCD and does not like a
22 left.
23 Q Okay. So did you have to do some research
24 to write this book? Is this stuff you've been
25 studying for a while because --

1 **A** Oh, yes.

2 **Q** I don't know any of that.

3 **A** The historical part.

4 **Q** Okay.

5 **A** The folklore part. And then, obviously,

6 I've taken some liberties with the mythological and

7 folklore parts --

8 **Q** Sure.

9 **A** -- to fit them all in to kind of create

10 this, you know, alternate universe --

11 **Q** Uh-huh (affirmative).

12 **A** -- where the gods were real and interacted

13 with each other.

14 **Q** How did you go about doing research for

15 the book?

16 **A** Online for some of it. But as far as

17 mythology and folklore, I love it. I have these

18 shelves of books that I just sit and read.

19 **Q** Uh-huh (affirmative). Okay.

20 **A** They're so good, but more the historical

21 stuff I do not like. I like it -- I have, like, a

22 big book on Rome but nothing on the Gauls outside of

23 mythology information.

24 **Q** When is the book set? What --

25 **A** 55 B.C.

1 Q Okay. And you said it's --
2 Is it also a fantasy romance type novel?

3 A Yes.

4 Q And what is that genera? Like, if you
5 could define it or describe it for me.

6 A Well, there's a whole fantasy element of
7 the heroes on some sort of journey --

8 Q Uh-huh (affirmative).

9 A -- where there's a bigger problem.

10 Q Uh-huh (affirmative).

11 A But they need to work together because
12 they're stronger together than they are apart, and
13 they each have different things that complement each
14 other. Siegfried has trust issues. Freya is overly
15 naive and trusting, but she's silly whereas he's
16 serious.

17 Q Uh-huh (affirmative).

18 A So there's this balance. And there's some
19 raunchy parts in the books, but there's a whole
20 over-arching plot --

21 Q Okay.

22 A -- where they are trying to locate her
23 evil uncle who's dabbled in things and is conspiring
24 against them along with some other members of the
25 fay, but you don't really find out about that later,

1 it's just hinted, small clues planted throughout the
2 book.

3 Q Okay. So the romance, is it between the
4 two -- those two main characters?

5 A **Yes.**

6 Q The one who has the water power and the
7 Siegfried the Fox?

8 A **Yes.**

9 Q Okay.

10 A **And he gets magic later, too.**

11 Q Okay. And the raunchy parts, those are
12 between him and --

13 A **Yes.**

14 Q -- her? And is it --

15 I guess distinguish for me the difference
16 between, like, a romance novel and erotica.

17 Is it an erotica book or is it a romance
18 book?

19 A **This one is erotica.**

20 Q Okay.

21 A **The sex scenes in erotica books. I don't**
22 **want to call them sex scenes, and I call them erotic**
23 **scenes because a lot of times it's just foreplay**
24 **type stuff --**

25 Q Okay.

1 A -- that goes on. But there are more of
2 those, and the detail is more explicit.

3 Q Okay. What the implication involves;
4 right?

5 A Correct.

6 Q Gotcha.

7 A There's very little implication involved.

8 Q So, like, Fifty Shades of Grey is really
9 popular right now.

10 A Yes.

11 Q Is it anything like that or is it more
12 detailed than that?

13 A I haven't read Fifty Shades.

14 Q I haven't, either.

15 A But from what people who've read the book
16 tell me, it's like a fantasy version of Fifty Shades
17 with less whiny, antsy characters.

18 Q Okay.

19 A And I take that as a compliment. I would
20 compare maybe some of the scenes slightly, except
21 it's only between him and her. I would compare
22 maybe some of that type of erotica to Anne Rice's.
23 She wrote with A.N. Roquelaure The Erotic Adventures
24 of Sleeping Beauty. R-O-Q-U-E-L-A-U-R-E (spelling),
25 I believe that's how she spells that particular

1 pseudonym.

2 Q Okay. And your pen name for this book is
3 what?

4 A **Aurora Styles.**

5 Q Okay. How did you come up with that name?

6 A **I thought it was simple but yet whimsical.**

7 Q Is Aurora Sleeping Beauty?

8 A **Yes.**

9 Q Okay. That's what I thought.

10 A **Because it is that fantasy element that
11 people will remember. People enjoy it.**

12 Q Uh-huh (affirmative).

13 A **And Styles, you know, cute clothing styles
14 and --**

15 Q Okay. Just sounded good?

16 A **I thought it sounded kind of catchy and
17 easy to remember.**

18 Q Gotcha. Okay.

19 A **One of those things where people aren't
20 gonna wonder how do I spell this if they're
21 searching.**

22 Q Is Aurora Styles writing any more books?

23 A **Aurora Styles has been trying to write
24 more books, but my concentration has been a little
25 shot. I got lucky with this first one because it --**

1 it was pretty much written, done --

2 Q Uh-huh (affirmative).

3 A -- before I sent it to the publisher.

4 My second book, I've been trying to get it
5 ready to be sent to the publisher, but my
6 concentration's been crap and --

7 Q Okay.

8 A Yeah. My concentration's been crap, so
9 hopefully --

10 Q So you're not under any obligation to Wild
11 Rose Press to produce a book in a certain period of
12 time?

13 A No.

14 Q Okay.

15 A I would like to.

16 Q Sure, sure. And as far as making money
17 off of the book that you have published, how does
18 that work?

19 A I get paid quarterly.

20 Q Okay.

21 A I haven't gotten my first check yet.

22 Q Okay.

23 A I haven't really looked at my sales
24 online. I should probably do that after Christmas.

25 Q Okay.

1 A But I also haven't been doing that much
2 local promotion, either, which I should be doing,
3 but I don't --

4 Q Do you get a percentage of sales?

5 A Yes. I just get, like, a percentage.

6 Q What is --

7 A I'm not sure on the percentage, and I
8 really probably should've printed out the contract.
9 It's a small-house publisher.

10 Q Uh-huh (affirmative).

11 A A lot of these fantasy romance books do
12 not go through the large-house publishers like
13 Random House, et cetera.

14 Q Uh-huh (affirmative).

15 A They're not gonna want to publish fantasy
16 erotica and fantasy romance for the most part.

17 Q Okay.

18 A You go through a small-house publisher.
19 And they tend to operate on a tighter budget, so you
20 get -- you don't get the advance pay.

21 Q Okay.

22 A You get just a percentage of sales.

23 Q A percentage? Gotcha. Are you --

24 Is your book available in bookstores?

25 A No.

1 Q Okay.

2 A You have to order it.

3 Q Okay.

4 A It's on Amazon. It's a print-on-demand,
5 but it's available in e-book --

6 Q Okay.

7 A -- through various, various sites.

8 Q Okay. So e-book, Amazon.

9 I assume you could order it probably
10 directly from the publisher?

11 A Yes.

12 Q What other sites can you order it from?

13 A I'm not sure. There's a few. I've
14 Googled it. There's a few romance book sites --

15 Q Okay.

16 A -- where they have -- maybe you should
17 look up Aurora Styles and Siren Slave (inaudible).

18 COURT REPORTER: I'm sorry. I missed
19 that.

20 A Okay. If you Google Aurora Styles Siren
21 Slave --

22 BY MS. COWAN:

23 Q Can you spell Aurora for the record?

24 A A-U-R-O-R-A (spelling), Styles,
25 S-T-Y-L-E-S (spelling).

1 Q Thank you.

2 A **And the book title is Siren Slave.**

3 Q S-I-R-E-N (spelling); right?

4 A **Yes.**

5 Q Okay.

6 A **Yeah. If you Google that, that should all**
7 **come up.**

8 Q Okay.

9 A **I've done a few Google searches to see**
10 **who's selling it, but Amazon's the popular.**

11 Q Sure. When you were -- or after you
12 published the book, were you asked by Wild Rose to
13 do any kind of interviews about it or have you done
14 any interviews about the book?

15 A **No. I haven't done any interviews.**

16 Q Okay.

17 A **I had started to -- well --**

18 Oh. I did one. That's right.

19 Q Okay.

20 A **I'm sorry. I did one for the local paper.**

21 Q Okay.

22 A **Jeff also has a copy of that --**

23 Q Okay.

24 A **-- that we brought with us.**

25 **And I really had meant to arrange more. I**

1 just -- my brain has been cluttered with other
2 things --

3 Q Okay. Okay.

4 A -- at the moment. And I really should've
5 organized book signings and stuff. I haven't.

6 Q Would you do, like, a reading of the book
7 or anything like that at a bookstore? Would that be
8 a thing you would do?

9 A I could read some of the more PG-rated
10 stuff.

11 Q Sure.

12 A Sensor out if there's any risque or crass
13 language --

14 Q Okay.

15 A -- and some of the body jokes.

16 Q Okay.

17 A I could read some of the more humorous
18 G-rated parts -- well, not G-rated, PG, PG-13-rated
19 parts.

20 Q Okay. When did you finish the book that
21 you ended up sending to the publisher to get the
22 ultimate approval?

23 A I finished it before I sent it to the
24 editor, and I can't remember the exact date.

25 Q That's what I meant.

1 A But I sent it to an editor to work with to
2 help me do what I needed to do to get it published.

3 Q And would that have been in 2010 or later
4 than that?

5 A The book would've been finished in --
6 like, completely done with working with the editor,
7 because I worked with the editor for about a year or
8 more --

9 Q Okay.

10 A -- to get it ready. It was initially 700
11 pages, and then we --

12 Q Whoa.

13 A Then we paired it down quite a bit.

14 Q Okay.

15 A She -- I finished working with Carol
16 Carson on it I believe around November of 2012.
17 There were many breaks taken from the book, you
18 know, between moving and --

19 Q Okay. And that's what I was gonna ask you
20 next, is how do you as a scheduling matter each day
21 go about doing the work that you do? Like, when you
22 were writing Siren Slave, how did you go about
23 writing it? Did you get up in the morning and work
24 for a particular amount of time or was it just
25 whenever it hit you?

1 A When I start on a story and I create my
2 characters, I can't stop writing. It's, like, an
3 obsession. I can't pull myself away from the
4 computer.

5 Q Uh-huh (affirmative).

6 A I just write and I write. I don't know
7 what's gonna happen next, so it's almost like
8 watching a movie that unfolds --

9 Q Uh-huh (affirmative).

10 A -- until I write myself into a corner, and
11 then I pace around the house cursing people that
12 don't exist.

13 Q Okay.

14 A And I remember the one Summer, I had taken
15 a break from the piece for a Summer until we moved
16 to North Carolina. And then I went back through
17 book one, and then immediately from there I went on
18 and wrote book two and book three. They're very
19 rough, but.

20 Q Is book one Siren Slave?

21 A Yes.

22 Q Okay. And book two's the one -- is a
23 different one?

24 A Yeah.

25 Q Okay.

1 **A Different couple, same world.**

2 **Q Okay.**

3 **A Same enemies.**

4 **Q Gotcha.**

5 **A And the dominoes start to fall in book two**
6 **in preparation for some of the big reveals in book**
7 **three, but it's very -- it's like the last two are**
8 **very rough --**

9 **Q Okay.**

10 **A -- and need work.**

11 **Q Okay.**

12 **A Yeah. Just more get it on the paper, play**
13 **with it, but I didn't pull myself away from the**
14 **computer hardly at all for a whole Summer. I was,**
15 **like, obsessed.**

16 **Q And what year was that?**

17 **A This would have been 2011 --**

18 **Q Okay.**

19 **A -- where I wrote the entire Summer.**

20 **Q And were you in Greenville then?**

21 **A Yes.**

22 **Q Okay.**

23 **A This was after the construction and**
24 **everything for the most part finished up on the**
25 **house and I did errands, did what I had to do, then**

1 **glued, glued to the stories.**

2 Q Okay.

3 A It's hard to explain to other people, but
4 it's always been that way. When you're struck, you
5 have to write it out.

6 Q Uh-huh (affirmative). When did you leave
7 Greenville, North Carolina?

8 A I left Greenville I believe it was May or
9 June 2013. I'm leaving -- I'm leaning towards June.

10 Q Okay.

11 A I'm so sorry about the --

12 Q No. That's okay.

13 A -- ambiguous quality of the dates --

14 Q That's all I can ask for --

15 A -- but I'm doing the best I can.

16 Q -- is just the best you can remember. So
17 June 2013.

18 Is that when you and your husband
19 separated?

20 A No. We separated actually in March.

21 Q March of 2013?

22 A Yes.

23 Q Okay. Where did you live between March
24 and June?

25 A I roomed with a friend.

DEPOSITION OF RENEE SCHROEDER BUTTS 12/18/2014
RENEE SCHROEDER vs. CALEB GILBERT

1 Q Okay. And who was that friend?

2 A Name was Shawn Brown who was friends with
3 both me and my husband. He'd watched our dogs. And
4 I've never had too many female friends, so.

5 Q Okay. Shawn? What was the last name?

6 A Brown.

7 Q Brown? Is it S-E-A-N (spelling) or
8 S-H-A-U-N (spelling)?

9 A S-H-A-W-N (spelling).

10 Q W-N (spelling)?

11 A I'm sorry. I should've spelled it because
12 there's a million different ways to spell Shawn.

13 Q That's okay. Okay. And why did you go to
14 stay with Shawn Brown? Just a place to stay?

15 A I didn't want to actually leave the house
16 because Bill and I were amicable.

17 Q Uh-huh (affirmative).

18 A We were fine. We were both ready to move
19 on and we talked.

20 Q Uh-huh (affirmative).

21 A But in North Carolina you have to live
22 separate and apart for a year before they will grant
23 a divorce.

24 Q Okay.

25 A There was no option for us to even be

1 roommates.

2 Q Was it March 2013 when that time period
3 began to run?

4 A That's what's in the separation agreement.

5 Q Okay.

6 A So, yes, yes. I'm trying to think if
7 that's when they started running it because the
8 divorce, even though all this, wasn't granted until
9 May of this past year.

10 Q Uh-huh (affirmative). Did you have an
11 attorney in North Carolina who represented you in
12 the divorce?

13 A I do and, sadly, I can't even remember the
14 name.

15 Q Okay. Are they in Greenville?

16 A Yes.

17 Q Okay.

18 A It was more not really representing me.
19 It was more consulting.

20 Q Okay.

21 A Ultimately my husband dealt with the
22 attorney stuff and.

23 Q Okay. Did y'all have the same attorney?

24 A I had a different attorney that I
25 consulted with --

1 Q Okay.

2 A -- to read over stuff.

3 Q Okay.

4 A But ultimately it was his who handled it
5 and mailed me the paperwork.

6 Q Okay. Did you file for divorce or did
7 your husband file for divorce?

8 A He filed.

9 Q Okay. And why, just generally, did y'all
10 decide to get divorced?

11 A Two different personalities. Though we're
12 very intelligent, we just operated on different
13 wavelengths. Being a chemical engineer, he's more
14 grounded in reality. And me being a fantasy writer,
15 I'm more flighty and silly.

16 Q Uh-huh (affirmative).

17 A And I've learned that sometimes those two
18 personality types just clash and can grate on each
19 other if you're in a small space.

20 Q Okay. I think you made some comments when
21 I -- on the video of the traffic stop and the arrest
22 about some verbal abuse from him?

23 A Oh, yes.

24 Q Did that happen?

25 A Yes, just him being very much annoyed with

1 me because I'm flighty.

2 Q Uh-huh (affirmative).

3 A I burned food, how could you be so stupid,
4 how dumb could you be, but always hearing you're
5 stupid, you're stupid, you're stupid.

6 Q Okay.

7 A Because my mind constantly wanders, I do
8 stuff all the time, and I drove him crazy.

9 Q Uh-huh (affirmative).

10 A And I forget stuff. Again, food would be
11 burned. Did you call whatever? Oh, no, I got
12 sidetracked.

13 Q Uh-huh (affirmative).

14 A That just annoyed the heck out of him, and
15 me not knowing what certain burners did on a stove,
16 what certain settings did.

17 Q Uh-huh (affirmative).

18 A I don't -- yeah, just a personality
19 conflict really.

20 Q Okay.

21 A You know, we got along better after we
22 agreed to separate. We could be friends again.

23 Q Okay. Are y'all currently friends?

24 A Yep.

25 Q When is the last time you spoke to him?

1 **A A couple days ago via text.**

2 **Q Okay. So y'all text-message?**

3 **A Yeah. He's busy with work. Sometimes we**

4 **talk on the phone but more text.**

5 **Q Yeah. Okay. Is he remarried?**

6 **A No.**

7 **Q Okay. And are you remarried?**

8 **A No.**

9 **Q Okay. Does he have a significant other?**

10 **A I don't know.**

11 **Q Okay. What about you?**

12 **A I'm dating casually.**

13 **Q Okay.**

14 **A But it's hard to get serious.**

15 **Q Okay. Okay. So March 2013 you went to**

16 **stay with Shawn Brown; right?**

17 **A Yes.**

18 **Q Okay. And were you paying him rent or**

19 **were you just staying there?**

20 **A I was paying for half of everything.**

21 **Q Okay.**

22 **A And I applied to stay at the apartment,**

23 **background checks and all that and. And I had a dog**

24 **there, too. My dad came in and bought me a puppy.**

25 **Q Okay.**

1 **A Because I couldn't keep the huskies in an**
2 **apartment.**

3 **Q Sure.**

4 **A And the boys were happier with Bill, and I**
5 **couldn't separate them, either.**

6 **Q Uh-huh (affirmative). Okay. Did you have**
7 **one of those dogs before y'all got married or did**
8 **y'all get those dogs together?**

9 **A He had Vlad, and I got Reagan.**

10 **Q Okay, okay.**

11 **A But they got very attached to each other**
12 **because I got Reagan as a puppy. When I was running**
13 **for office I, you know -- I wanted my little guy, my**
14 **little buddy.**

15 **Q So what did you name your new dog?**

16 **A Loxley.**

17 **Q Okay.**

18 **A Sir Robin of Loxley.**

19 **Q Oh. You've got some creative dog names.**

20 **A He's a Yorkshire Terrier.**

21 **Q Okay.**

22 **A But I don't have him anymore.**

23 **Q Okay. Everything go okay with your stay**
24 **at Shawn Brown's house in March 2013?**

25 **A No.**

1 Q Okay. What happened there?

2 A I thought Shawn and I were friends. We'd
3 been friends for a while. He started putting
4 pressure on me to do things with him.

5 Q Okay.

6 A He would start trying to touch me. And
7 when I would move away, like, no, I'm not
8 interested, he'd say -- he'd try to charge me more
9 money when I was already paying half of everything.

10 Q Uh-huh (affirmative).

11 A Like, you need to buy more beer, you need
12 to buy more chips, you need to buy more microwave
13 food --

14 Q Uh-huh (affirmative).

15 A -- whatever, just you need to buy
16 something or pay for something whenever I rebuffed
17 his advances.

18 Q Uh-huh (affirmative).

19 A And it ended up with me and Loxley
20 spending a lot of time in the room. I was staying
21 in there with the door locked.

22 Q Okay.

23 A And I'd be on the phone with mom or
24 talking with friends on Facebook --

25 Q Okay.

1 **A** -- or just trying to do the divorce stuff.

2 **Q** Okay. Okay. So how did that ultimately
3 get resolved?

4 **A** I ended up leaving Shawn Brown's. He
5 started to get beyond creepy.

6 **Q** Okay.

7 **A** And I kind of left rather suddenly.

8 **Q** Okay.

9 **A** Just after he -- his hand started
10 wandering up my leg one day, and I told him no. And
11 he kept doing it, and I just --

12 **Q** Okay.

13 **A** I didn't want to live in those kind of
14 conditions, but I had nobody else to stay with down
15 there. And my friend Maria had three kids, and she
16 and her husband were staying with his parents or her
17 parents but definitely not room for one more person
18 in there.

19 **Q** Uh-huh (affirmative). So how did you
20 leave suddenly? Just something happened and you
21 left or what?

22 **A** Devon suggested I go stay with him.

23 **Q** Okay.

24 **A** Because I didn't want to come back to
25 Pennsylvania. I don't really like the cold and

1 snow.

2 Q Okay.

3 A And I also wanted to see if I could, you
4 know, forge my own way.

5 Q Okay.

6 A And I -- Georgia teacher pay. Their cost
7 of living seemed great.

8 Q Okay.

9 A So I scheduled my teaching test at least
10 and everything before I left, but I left very
11 suddenly after Shawn started to get testy and
12 upsetting. I didn't want to be there. I packed up
13 my car --

14 Q Okay.

15 A -- and drove, packed up my car, packed up
16 Loxley. The rent was paid up.

17 Q Okay. And Devon, we're talking about
18 Devon Beazer?

19 A Yes.

20 Q Okay. How did you know Devon?

21 A We met online.

22 Q Okay.

23 A And we talked and he -- he'd come in to
24 visit before I went down there. We'd hung out a few
25 times.

1 Q Okay. And how did y'all meet online? Was
2 it the World of Warcraft stuff?

3 A **Yeah.**

4 Q Okay. Okay. So you went --

5 And he was in Atlanta at the time?

6 A **Yes.**

7 Q Okay.

8 A **So it was convenient. I didn't want to**
9 **get wrapped up in an apartment lease and everything**
10 **if it didn't work out --**

11 Q Okay.

12 A **-- and I'd need to come home.**

13 Q Okay. So what month of 2013 did you go to
14 stay with Devon?

15 A **Late May, early June.**

16 Q Okay. 2013; right?

17 A **Yeah.**

18 Q Okay. And at the time you went to stay
19 with Devon, were you dating Devon at that time?

20 A **Dating casually. I didn't want anything**
21 **serious. Yes, I know I was staying there, but it**
22 **was more for me to teach and I was helping him with**
23 **expenses.**

24 Q Okay.

25 A **It's kind of, like, mutual benefits.**

1 Q Okay.

2 A So he didn't have to get a roommate, me
3 and Loxley came down and I -- if I was -- if I were
4 gonna stay there -- I'd wanted to get my own place,
5 but first I wanted to make sure I could get a job
6 and that I liked the area before committing to a
7 lease.

8 Q Okay. Did anybody else live there with
9 you?

10 A No.

11 Q Okay. So just you and Devon and the dog?

12 A Yeah.

13 Q Okay. And what was the address of that
14 apartment?

15 A I know it was Cimarron Parkway, but I
16 don't remember the exact address.

17 Q Okay. When you moved to Atlanta, did you
18 change your address and everything so that you were
19 receiving mail and bills and all the information you
20 get in the mail at Atlanta?

21 A Oh, gosh. I'm trying to remember that. I
22 know I talked to Bill then about once every week or
23 two --

24 Q Okay.

25 A -- on the phone. So if there was

1 anything, he could send it to me.

2 Q Okay.

3 A But most of the bills and everything were
4 in his name.

5 Q Okay.

6 A Like, I don't have car payments or student
7 loans or any of that. That's all taken care of.
8 But I didn't really have any bills, and per the
9 separation agreement I was still on his insurance
10 and --

11 Q Okay.

12 A -- phone bill, so I didn't really have --

13 Q Okay.

14 A -- any bills coming.

15 Q Did you --

16 What did you do with regard to teaching
17 when you moved to Atlanta?

18 A I took the teaching test on June 15th. It
19 took a while to get the results back.

20 Q And what is it called in Georgia?

21 A It was -- I believe it's the GACE.

22 Q Okay.

23 A Georgia certification of education is
24 probably what it stands for.

25 Q Okay. So you took that June 15th of 2014?

1 **A Yes.**

2 **Q**Were you going to have to student-teach in
3 Georgia?

4 **A No.**

5 **Q**Okay.

6 **A I already did my student teaching. It was**
7 **pretty much take the test, get my certificate and**
8 **apply.**

9 **Q**Okay. Did you --

10 **When did you get your results from the**
11 **GACE?**

12 **A I don't remember the exact dates I got the**
13 **results. The first --**

14 **Q**Okay.

15 **A It was shortly before Erica came in to**
16 **visit.**

17 **Q**Okay.

18 **A And I was afraid to look. I really**
19 **thought I had failed.**

20 **Q**Okay.

21 **A I really -- there were so many poetry**
22 **questions, I thought I'd failed miserably.**

23 **Q**Okay.

24 **A I didn't --**

25 **Q**Did you pass?

1 **A** I did.

2 **Q** Okay.

3 **A** But I didn't look at it until after all
4 this happened.

5 **Q** Okay.

6 **A** And I was like I'm gonna look at it now,
7 this isn't so scary.

8 **Q** Okay.

9 **A** I saw I passed and I was like thank God.

10 **Q** Okay. So did you apply to teach anywhere
11 when you came to Atlanta or did you plan to take the
12 test and then apply?

13 **A** I was gonna take the test and then apply.
14 From what I understood, that's how you have to go
15 about it --

16 **Q** Okay. Okay.

17 **A** -- to the best of my knowledge from the
18 people I communicated with.

19 **Q** Okay.

20 **A** I know I made a few phonecalls to fully
21 understand the process.

22 **Q** Were you interested in public school
23 systems?

24 **A** Wherever I could get a job teaching
25 English.

1 Q Okay.

2 A And I was honestly really hoping more for
3 something, if there were any -- if there are any
4 schools maybe with a writing program --

5 Q Okay.

6 A -- or something where I could focus a
7 little bit more on writing.

8 Q What kind of investigation had you done
9 into the types of schools you wanted to teach in in
10 the area?

11 A I just looked online to see who was hiring
12 English teachers --

13 Q Okay.

14 A -- and writing teachers, things that would
15 fit me for the grade levels that I was qualified to
16 teach.

17 Q And what did you find?

18 A There seemed to be quite a few.

19 Q Did you see particular counties or do
20 you --

21 A I did, and I don't remember which
22 particular ones.

23 Q Okay.

24 A But I had a list at the time that I wanted
25 to apply.

1 Q Okay. Did Devon live in Fulton County, do
2 you know?

3 A Oh, gosh. I'm so sorry. I don't
4 remember.

5 Q That's okay. Okay.

6 A I get a little confused with the different
7 counties here.

8 Q Sure. Okay. So I see -- I think I
9 have -- let me make sure I've got the timeline
10 right.

11 But May or June you came down?

12 A Uh-huh (affirmative).

13 Q And you were -- you took your test and you
14 were waiting for results.

15 What did you do on a daily basis? Were
16 you writing while you were down here or what were
17 you doing?

18 A I was writing and communicating with this
19 publisher, The Wild Rose --

20 Q Okay.

21 A -- that eventually took me.

22 What else was I doing? Oh, gosh. Why is
23 it so hard to remember things?

24 I was taking care of Loxley a lot, too,
25 the puppy.

1 Q Okay.

2 A He was still learning how to be
3 house-broken, so we were spending a lot of time
4 together.

5 Q Okay.

6 A He was a difficult dog to house-break.

7 Q Yeah. I was gonna say house-breaking a
8 dog is never any fun.

9 A Yorkies. The huskies were easier.

10 Q So Erica -- you referred to Erica coming
11 down to visit. Is that --

12 Can you pronounce her last name for me?

13 A Andruscavage.

14 Q Can you spell that for the record?

15 A A-N-D-R-U-S-C-A-V-E (spelling).

16 Q Okay. And how do you know Erica?

17 A Erica and I met in high school. We
18 weren't friends until college, Bachelor's degree
19 college.

20 Q Okay. Did she go to the same college as
21 you?

22 A Yes. She went to King's and she went to
23 Coughlin.

24 Q Okay. And what does Erica do for a
25 living?

1 **A She is a teacher.**

2 **Q**Okay. Where does she teach?

3 **A I believe Maryland. She moved from**

4 **Maryland into Virginia. Oh, she talks to me about**

5 **it all the time and I can't remember now.**

6 **Q**What does she teach?

7 **A English, high-school English.**

8 **Q**Okay. Is it a public high school in

9 **Maryland?**

10 **A I believe so.**

11 **Q**Okay. Does Erica write?

12 **A Yes.**

13 **Q**And what types of things does Erica write?

14 **A She was working on a young-adult fiction,**

15 **but now she changed her focus and she's writing some**

16 **sort of fictionalized memoir.**

17 **Q**Okay. A fictionalized memoir?

18 **A Yes.**

19 **Q**Okay.

20 **A She's changed the names of people under**

21 **the circumstances slightly --**

22 **Q**Okay.

23 **A -- from what I understand. I haven't read**

24 **any of it. Maybe I did when she came to visit. I**

25 **think I might have read a few things --**

1 Q Okay.

2 A -- a few passages now that I think about
3 it.

4 Q Has she published any books?

5 A No.

6 Q Okay. Does she aspire to do that?

7 A Yeah. She wants to get her memoir
8 published.

9 Q Okay. Does she do World of Warcraft also?

10 A No.

11 Q Okay. How did you get into World of
12 Warcraft?

13 And you're gonna have to educate me
14 because I don't -- it seems very involved and I
15 don't --

16 A It is.

17 Q -- know anything about it.

18 A My husband and I wanted something else to
19 do together because I was doing a lot of writing and
20 he was doing a lot of fixer-upper stuff around the
21 house.

22 Q Okay.

23 A Completely -- you know, completely
24 different world.

25 Q Uh-huh (affirmative).

1 A So we both like gaming. We used to play
2 two-player games if we could find them. So we
3 thought let's do this and let's play together --

4 Q Okay.

5 A -- something we could do together, and
6 that's how we started.

7 Q Okay. So it was when you were first
8 married you got into World of Warcraft?

9 A No, when we were in North Carolina.

10 Q Oh, okay. So once you moved to North
11 Carolina?

12 A Yeah.

13 Q Had he played World of Warcraft before?

14 A Not World of Warcraft. He played some
15 other MMO's. MMO is multi something, multiplayer
16 online games.

17 Q What was it called? Do you remember what
18 it was called?

19 A I believe it was EverQuest that he played.

20 Q Okay.

21 A And then there's another one called Ebony
22 that was kind of low-grade from what I think. It
23 wasn't very -- didn't seem very quality.

24 Q Okay. And do y'all still play together on
25 World of Warcraft?

1 **A No.**

2 **Q Okay.**

3 **A We both like completely different aspects**

4 **of the game.**

5 **Q Okay.**

6 **A We didn't actually play that together.**

7 **Q Can you just kind of generally describe**

8 **for me how World of Warcraft works?**

9 **A Have you ever played any --**

10 **Q No.**

11 **A You create --**

12 **Q You have to go basic with me.**

13 **A You create a character --**

14 **Q Okay.**

15 **A -- that's a different class of certain**

16 **abilities.**

17 **Q Okay.**

18 **A And there are different things you can do**

19 **in a game. You can do raiding, which is killing**

20 **non-player characters.**

21 **Q Uh-huh (affirmative).**

22 **A You have raid bosses, et cetera -- people**

23 **get very concerned about numbers -- or you can go**

24 **kill other players.**

25 **Q Okay.**

1 **A** Player versus player, PVP. I was more
2 into PVP. He liked raiding.

3 **Q** Okay.

4 **A** And then as a writer I got involved in
5 role play, which is kind of like collaborative
6 writing with other people.

7 **Q** Okay.

8 **A** So it was kind of very appealing to me to
9 have the company of other people who had similar
10 interests.

11 **Q** Uh-huh (affirmative).

12 **A** Really hard to meet other writers --

13 **Q** Uh-huh (affirmative).

14 **A** -- or anybody with an interest in that --

15 **Q** Okay.

16 **A** -- it seems.

17 **Q** Okay. And do you ever go --

18 Are you still involved in World of
19 Warcraft?

20 **A** I still play.

21 **Q** Okay. And what about do they have events
22 that you would go to or do you do it all virtually?

23 Does that make sense what I'm asking?

24 **A** It's like you can host events virtually in
25 games.

1 Q Okay. Okay.

2 A You just send things to guild leaders.

3 Guilds are a group of people. And they'll put it on
4 their calendar for their guild members to attend.

5 Q Okay. How often currently do you think
6 you play World of Warcraft, like, each day? Do you
7 play it daily?

8 A Yeah.

9 Q Okay. How long each day do you think you
10 play?

11 A A few hours.

12 Q Okay.

13 A Probably in the evening.

14 Q Okay.

15 A I don't leave the house much.

16 Q Okay. So Erica came down to visit it
17 sounds like while you were waiting to get your GACE
18 results back?

19 A Yeah. I had them before she came, and I
20 was afraid to look.

21 Q Oh, okay.

22 A I didn't want to ruin the trip. I -- like
23 I said, I really thought I failed.

24 Q Uh-huh (affirmative).

25 A All those poetry questions. I'm a

1 terrible English major. I was more into the writing
2 aspect and I really --

3 Q Didn't like the poetry?

4 A I never got into the old dead authors very
5 much, especially poetry.

6 Q Okay. Okay.

7 A So a lot of times I'd just take notes in
8 class and still ace the test.

9 Q There ya go. So what did she come in for?
10 Just to visit?

11 A To visit. And I wanted to ask her, like,
12 what I should do. I wanted to talk to her about a
13 few things that were going on.

14 Q Okay.

15 A Devon turned out to be -- how should we
16 say this? -- a lacking in basic intelligence --

17 Q Okay.

18 A -- bad at managing money, et cetera. And
19 at this point I was just like it went bad, you know,
20 staying with Shawn Brown, my marriage went bad,
21 Erica, I don't trust my decisions, what am I
22 doing --

23 Q Uh-huh (affirmative).

24 A -- what am I doing. And we had a talk,
25 and she's like I think you might want to go back to

1 **Pennsylvania.**

2 Q Uh-huh (affirmative).

3 A And I texted my mother the night all this
4 happened and a few friends, like, I'm gonna come
5 back.

6 Q Okay.

7 A I really might come back and.

8 Q So what happened with Devon and him not
9 handling money well? What --

10 A He would ask me for money.

11 Q Oh.

12 A Like, he somehow overdrew his bank and
13 couldn't get Burger King. Come on.

14 Q Okay.

15 A So I would have to -- I ended up footing
16 the bill again. It was kind of almost like a replay
17 of Shawn Brown to some extent.

18 Q Okay.

19 A And I was just like I'm, you know, better
20 off just going home.

21 Q Did he ever act inappropriately towards
22 you?

23 A Yes.

24 Q Okay. Was that when you first moved down
25 or was it later?

1 **A Later.**

2 **Q**Okay. Okay. And y'all were dating
3 initially, right, casually I think you said?

4 **A Yes.**

5 **Q**Okay.

6 **A Yeah. There were difficulties, so I**
7 **contacted Erica.**

8 **Q**Okay.

9 **A I wanted someone else to approve my**
10 **decisions or confirm things.**

11 **Q**Yeah.

12 **A I --**

13 **Q**How long was Erica down here?

14 **A She came in on the 30th, I believe the**
15 **30th or the 31st, and she left that Monday, the 5th.**

16 **Q**Okay. So would it have been July 30th or?

17 **A July 30th through 31st. I'm getting -- I**
18 **think the 31st, though, honestly.**

19 **Q**Okay. And what did y'all do while she was
20 down here?

21 **A Erica came in, and we spent a lot of time.**
22 **Our favorite thing to do is watch B-horror movies.**

23 **Q**Okay.

24 **A So we watched a lot of really terrible**
25 **movies, like, Nazi Zombies, French people painted**

1 green.

2 Q Okay.

3 A Just horrible, horrible movies and we
4 laughed, and we also watched a lot of Kitchen
5 Nightmares.

6 Q Okay.

7 A That was the first night she came in. But
8 then she wanted to shop, and we did a lot of
9 shopping.

10 Q Okay.

11 A We did a lot of shopping together. I
12 hadn't really gone shopping with her in a while, and
13 I was trying not to spend money so I could kind of
14 splurge when she was in.

15 Q Okay.

16 A I could pretty much sum it up to watching
17 bad movies and shopping.

18 Q Shopping? Okay.

19 A And we did do some time laying by the
20 pool, too.

21 Q Okay. What did Devon do for a living at
22 that time?

23 A He was a mechanic.

24 Q Okay. Where?

25 A I don't know the name of the place. I

1 can't remember.

2 Q Was it at a car dealership?

3 A No. I think it was at a service center, I
4 think.

5 Q Okay. And, then, do you know what he's
6 doing now?

7 A No idea.

8 Q Okay. Do you still talk to Devon?

9 A No.

10 MS. COWAN: Okay. This might be a good
11 place for us to take a break because I need
12 to use the restroom.

13 THE WITNESS: Me, too.

14 MS. COWAN: So if we could go off the
15 record for a few minutes.

16 (Whereupon, there was a recess
17 in the deposition from 12:34 to
18 12:38.)

19 BY MS. COWAN:

20 Q Your attorney handed me your palm card and
21 the -- I think this is the --

22 A Yeah. That's --

23 Q -- article with the interview that you
24 gave about your book; is that right?

25 A Yeah. And this came out in late September

1 this article was done.

2 Q I'm gonna mark as Exhibit 3 "Wilkes grad
3 builds a fantasy full of characters" is the title of
4 the article it looks like.

5 A Yeah.

6 (Thereupon, for identification purposes,
7 Defendant's Exhibit 3.)

8 BY MS. COWAN:

9 0 And it came out when did you say?

10 A September 5th.

11 Q Okay.

12 A But this came out late September.

14 A September 20 something. I can't remember
15 the exact date.

16 Q Okay.

17 A And there's no date on here, is there?

18

Nope.

19 Q Okay. We've got there -- I think you've
20 already talked about that.

When were you first prescribed any type of anxiety medication?

23 A I can't -- don't quote me on the exact
24 date.

1 **A** It was while I was working at the
2 courthouse.

3 **Q** Okay. So would that have been, like, '08,
4 '09 or something?

5 **A** Somewhere in there, yeah.

6 **Q** Okay.

7 **A** Somewhere in there.

8 **Q** Okay. And what were you prescribed then?

9 **A** I'm not a hundred percent sure. I think
10 it might have been Ativan, I think.

11 **Q** Ativan?

12 **A** Yeah.

13 **Q** Is that A-T-I-V-A-N (spelling)?

14 **A** Probably.

15 **Q** Okay.

16 **A** I'm not sure.

17 **Q** Okay.

18 **A** I'm not sure. I think. Don't quote me on
19 that, but I think.

20 **Q** Okay.

21 **A** To the best of my recollection.

22 **Q** So I've got that you worked for the
23 commissioner between 2008 and 2009.

24 **A** Yes.

25 **Q** So it would've been somewhere in that time

1 period?

2 **A Yes.**

3 **Q**Okay. And anything else that you were
4 prescribed at that time?

5 **A In 2009, shortly thereafter, I had a skin**
6 **problem that I was prescribed Xyzal for, X-Y-Z-A-L**
7 **(spelling).**

8 **Q**Okay.

9 **A I'm not sure what the long term is for**
10 **that name --**

11 **Q**Okay.

12 **A -- because I know there's a longer.**

13 **Q**Okay. And was that the re --

14 What was the skin condition, if you don't
15 mind just generally describing it?

16 **A They actually don't know.**

17 **Q**Okay.

18 **A I've been told a few different things, but**
19 **the Xyzal helped.**

20 **Q**Did you break out in bumps or something
21 or?

22 **A I got these little red patches. You can**
23 **see a few on my elbow.**

24 **Q**Okay.

25 **A But I would get them, like, on my thighs**

1 and on my back, and I have no idea why. Of course,
2 this happened a few months before the wedding --

3 Q Uh-huh (affirmative).

4 A -- as luck would have it.

5 Q Right. Okay. Do you still take Xyzal?

6 A I haven't had it prescribed to me in a
7 while. I don't -- I've just kind of stopped. I'm
8 really bad at taking medication.

9 Q Okay. And what about Ativan? Do you
10 still take Ativan?

11 A No.

12 Q Okay. Okay. How long did you take Ativan
13 after you were prescribed it in '08 or '09?

14 A I can't answer that definitely. I took it
15 as needed. I mean, it said on the bottle take once
16 a night, but I didn't take it very often.

17 Q Okay.

18 A So it was, like, an as-needed thing. I
19 might take one once a month or once every two months
20 or sometimes maybe two in a week depending.

21 Q Okay.

22 A I only took it if I was really having a
23 bad panic attack.

24 Q Okay. And so that is --

25 It was prescribed for panic attacks you

1 were having at the time?

2 A **Yes.**

3 Q Okay.

4 A Well, anxiety and panic. I was just
5 getting really on edge working at the courthouse.
6 There's scandals going on and lots of angry
7 constituents and death threats and --

8 Q Okay.

9 A -- a lot going on there.

10 Q Okay. And so what types of, I guess,
11 anxiety symptoms were you having at that time?

12 A My heart would start racing, palms would
13 get sweaty, I'd start getting dizzy, just, like,
14 stomach in knots.

15 Q Uh-huh (affirmative).

16 A This happened to me one day while driving
17 and it was scary, but it didn't happen very often.

18 Q Okay.

19 A Just when it did, it was pretty
20 horrifying.

21 Q And what doctor did you go to see when
22 that started happening?

23 A I went to go see Dr. Barry Eisenberg. I'm
24 not even sure if he's still practicing.

25 Q What type of doctor was he?

1 **A General practitioner.**

2 **Q Okay.**

3 **A I don't really go to doctors much.**

4 **Q Okay. After you quit working for the**
5 **commissioner, did you continue to have a**
6 **prescription for Ativan or did that stop?**

7 **A I don't particular -- I don't actually**
8 **remember.**

9 **Q Okay.**

10 **A Because it would last me a while.**

11 **Q Okay.**

12 **A I didn't take it much.**

13 **Q Okay.**

14 **A But I know I had some panic attacks, like,**
15 **when Bill would get home really late and not call.**

16 **Q Uh-huh (affirmative).**

17 **A Dangerous, icy roads, I'd start thinking**
18 **maybe something happened.**

19 **Q Okay. Did you have --**

20 **Did it work if you took it as needed or?**

21 **A Yes.**

22 **Q Was it something you could just take the**
23 **pill and that would help with the panic attack then?**

24 **A Yes.**

25 **Q Okay. Okay. Any other prescription**

1 medication that you've been prescribed for anxiety
2 other than Ativan? And I understand the Xyzal is
3 for your skin condition.

4 **A Right now I'm on Prozac and prazosin.**

5 **Q Okay.**

6 **A That's not anything that's a -- that**
7 **they -- I talked to doctors. They say that those**
8 **aren't controlled substances, because I'm afraid to**
9 **be prescribed any kind of controlled substance.**

10 **Q Okay. So the -- what is the -- let's see.**
11 **2008/2009 you would take Ativan as needed.**

12 **2009 to 2010 did you take Ativan as needed**
13 **then, too?**

14 **A I honestly don't remember.**

15 **Q Okay. After you got married, just on**
16 **an -- on a regular basis would you take Ativan if**
17 **you needed it, for example, if Bill was coming home**
18 **late on icy roads or something?**

19 **A Yes.**

20 **Q Okay. So if you started to feel the**
21 **symptoms of a panic attack, you would take an**
22 **Ativan?**

23 **A Not if I started feeling symptoms. I'd**
24 **wait until it got really bad.**

25 **Q Okay. So you'd make sure you were having**

1 one before you took it?

2 **A Right.**

3 **Q Okay.**

4 **A I had a few relatives get injured and die**
5 **in car accidents, so it's --**

6 **Q Uh-huh (affirmative).**

7 **A -- it scares me.**

8 **Q So when you came to Atlanta and you were**
9 **living with Devon, did you have a prescription**
10 **with At -- for Ativan with you that you would take**
11 **as needed?**

12 **A Yes.**

13 **Q Okay. And did you take it as needed while**
14 **you were living with Devon?**

15 **A Yeah. I think I took, like, the last one.**

16 **Q Okay.**

17 **A But, I mean, yeah, you can see how long**
18 **stuff lasts for me.**

19 **Q Okay. Was that all the same prescription?**

20 **A Yeah. I don't really --**

21 **Q Okay.**

22 **A I don't -- didn't really re-up anything.**
23 **And in North Carolina it kind of just -- anxiety for**
24 **the most part went away.**

25 **Q Okay.**

1 **A It's a lower pace of life, no icy roads.**

2 **Q**What about during your divorce? Did you
3 experience panic attacks at that time?

4 **A Yes.**

5 **Q**Okay. And what did you do about that then
6 during your divorce, your panic attacks?

7 **A They weren't really horrible. And if they
8 ever got really bad, I did take an Ativan.**

9 **Q**Okay. Did you see anyone for counseling
10 with Bill during your divorce?

11 **A No.**

12 **Q**Okay. And what about independently?

13 **A No.**

14 **Q**Okay.

15 **A I talked to my family because they've been
16 through it.**

17 **Q**Okay. Was Dr. Eisenberg your general
18 practitioner?

19 **A Yes.**

20 **Q**And how long did you see Dr. Eisenberg?
21 From when you were a child or?

22 **A No. I went to him for a few years, I
23 believe. I never went to the doctors regular
24 really, only if there was ever a problem.**

25 **Q**Okay.

1 **A So he might not see me even once a year.**

2 **Q**Okay. Did you have a general practitioner
3 in North Carolina?

4 **A No.**

5 **Q**Okay. Did you ever go back to
6 Dr. Eisenberg while you lived in North Carolina?

7 **A No.**

8 **Q**Okay. What types of things did you go to
9 Dr. Eisenberg for?

10 **A My skin problem, a general checkup once --**

11 **Q**Uh-huh (affirmative).

12 **A -- and my back problems after the car
13 accident and the anxiety, and that's really it.**

14 **Q**Okay. How many times do you think you saw
15 Dr. Eisenberg for anxiety?

16 **A Maybe once or twice. It wasn't --**

17 **Q**Was it more than once?

18 **A I'm trying to remember if I continued to
19 discuss this with him, but I think it was one of
20 those things that he just brought up afterwards when
21 I was there for other things, like, my back problems
22 because back problems and stuff happened not -- you
23 know, that's the ending of my courthouse job.**

24 **Q**Uh-huh (affirmative).

25 **A I would be there for back problems, and**

1 then soon after that there was the skin problems.

2 Q Okay.

3 A It's probably one of those things that
4 would've been asked about at a general appointment.

5 Q And so he treated you after your car
6 accident?

7 A Yes.

8 Q Okay.

9 A He wasn't the chiropractor, but I did
10 go -- you know what, they did chiropractic work
11 there. Yes, they did. That's right.

12 Q Did you file a lawsuit over the car
13 accident?

14 A We did, and I don't remember the number.
15 I think it was largely handled through my insurance.

16 Q Okay. Who was your insurance with?

17 A Erie Insurance.

18 Q Erie?

19 A Yeah.

20 Q E-R (spelling) --

21 A E-R-I-E (spelling).

22 Q Okay.

23 A Like Lake Erie.

24 Q Okay.

25 A And I got checks mailed once in a while.

1 I don't remember what the whole settlement was for.

2 The checks were for small amounts.

3 Q Okay. So it settled?

4 A Yeah.

5 Q Okay. Did you ever meet with an attorney
6 over that?

7 A No.

8 Q Okay.

9 (Thereupon, marked for identification
10 purposes, Defendant's Exhibit 4.)

11 BY MS. COWAN:

12 Q I'm gonna mark your responses to
13 Interrogatories as Exhibit 4.

14 A Okay.

15 Q I'm gonna hand it to you so we can look at
16 a couple of things in there.

17 A Okay.

18 Q Do you remember looking over this
19 document?

20 A Yes.

21 Q Okay. When did you first hire
22 Mr. Filipovits as your attorney?

23 A I believe it was last January. I think it
24 was last --

25 Q Okay.

1 A It was -- we were discussing it at least
2 last I believe January.

3 Q Okay. How did you hear about or meet
4 Mr. Filipovits?

5 A Well, we hired Elizabeth Vila Rogan when
6 all this happened. And I wanted someone to get my
7 mugshots off the Internet --

8 Q Okay.

9 A -- or somebody to help me do that, and
10 that's how I met Mr. Filipovits.

11 Q Okay.

12 A Elizabeth recommended him.

13 Q Okay. Was Elizabeth your criminal
14 attorney?

15 A Yes.

16 Q Okay. And is she in this office?

17 A No.

18 Q Do you know? Okay. Is she a -- is she a
19 Georgia attorney?

20 A Yes.

21 Q Okay. And so she referred you to
22 Mr. Filipovits?

23 A Yes.

24 Q Okay. And are you paying Mr. Filipovits
25 hourly for his services?

DEPOSITION OF RENEE SCHROEDER BUTTS 12/18/2014
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1 MR. FILIPOVITS: I would object on the
2 basis of attorney-client privilege.

3 MS. COWAN: Okay.

4 THE WITNESS: Should I still go ahead
5 and answer that or?

6 MR. FILIPOVITS: No. Don't answer it.

7 THE WITNESS: Okay. I just want to
8 make sure I'm doing the right thing.

9 MS. COWAN: Yeah. No. He'll tell you
10 if you need to answer something.

11 THE WITNESS: Okay.

12 BY MS. COWAN:

13 Q If you can, let's -- let's see, point you
14 to the right number.

15 The day of the arrest was August 2nd,
16 2013; right?

17 A **Yes.**

18 Q Okay. And the Interrogatory No. 15, if
19 you want to turn there --

20 A **All right.**

21 Q -- asked about your activities leading up
22 to the time of the arrest --

23 A **Yes.**

24 Q -- and kind of what you, Erica and Devon
25 were doing.

1 **A Yes.**

2 **Q**What restaurant did y'all eat at that
3 night?

4 **A I'm not sure. It was in a small -- it was**
5 **in, like, a small towny area.**

6 **Q**Okay.

7 **A We wanted to go to a record store. She**
8 **want -- Erica wanted to go. The record store was**
9 **closed, so -- and there was a restaurant nearby.**

10 **Q**Okay.

11 **A It was a -- it wasn't a chain restaurant.**

12 **Q**Okay. What kind of restaurant was it?

13 **A Basic bar food, like, soups and burgers**
14 **from what it seemed.**

15 **Q**Okay. What was the record store y'all
16 went to?

17 **A I don't remember the name of it because it**
18 **was closed.**

19 **Q**Okay.

20 **A She wanted to go, and she was unaware that**
21 **it had been closed down.**

22 **Q**Okay.

23 **A It didn't say it on the Google search.**

24 **Q**Okay.

25 **A I'm not very much into records, so --**

1 Q Okay.

2 A -- it was one of those things where I was
3 gonna get dragged along.

4 Q Okay. Did you ever meet Devon Beazer's
5 brother while you were down here?

6 A Yes.

7 Q Okay. What's his name? Do you know?

8 A J.R.

9 Q J.R. Beazer?

10 A Yeah.

11 Q Okay. Did he live with Devon?

12 A No. He came to stay for a bit.

13 Q Okay. Did he stay there at the same time
14 that you were staying there?

15 A Yes.

16 Q Okay. Where does he live?

17 A I'm not sure.

18 Q Okay. Do you think it's in the Atlanta
19 area?

20 A Maybe.

21 Q Okay.

22 A Maybe. I'm not really sure about --

23 Q Okay.

24 A I didn't particularly care for him, so.

25 Q Okay. When mister --

1 When Officer Gilbert started -- turned on
2 his lights and was pulling over the car that was
3 being driven by Mr. Beazer --

4 **A Yes.**

5 Q -- what conversation was going on in the
6 car?

7 **A Erica was reading some passages from The**
8 **Shining. She'd just purchased it at Barnes & Noble.**

9 Q Okay.

10 **A She was excited. Apparently there was a**
11 **remake or something coming out, I'm not quite sure,**
12 **or a second version of it, but we were talking about**
13 **Stephen King.**

14 Q Okay. So you see that you're starting to
15 get pulled over.

16 **A Yeah.**

17 Q Right?

18 **A Yes.**

19 Q Did you notice the lights?

20 **A No. Somebody else did and said, oh, those**
21 **are for us.**

22 Q Who did?

23 **A It was Erica or Devon. I can't remember.**

24 Q Okay.

25 **A But it wasn't me.**

1 Q Okay. And what books had you purchased at
2 Barnes & Noble that night?

3 A Some Kresley Cole.

4 Q Okay.

5 A I don't remember the exact title, but she
6 had a new one come out. G.A. Aiken is another
7 author. She writes the Dragon Kin series. It's
8 absolutely amazing.

9 Q Okay.

10 A And I grabbed some of those books. I
11 don't remember exactly how many, but I got a few
12 books.

13 Q Okay. The video of the initial traffic
14 stop in the case shows that it took a pretty-good
15 amount of time to pull over -- Mr. Beazer took a
16 good amount of time to pull over before he actually
17 came to a stop, and Mr. Gilbert was able to get out
18 and talk to him.

19 A Yeah.

20 Q What was going on during that time?

21 A Erica and I were like why are you driving
22 so slow, we're getting pulled over, why are you
23 driving slow. And he was like I'm trying to be safe
24 and find a place for us to pull over.

25 Q Okay.

1 A I was like it's not that hard, there's a
2 parking lot.

3 Q Okay.

4 A I mean, you could drive there at a speed
5 above five miles an hour.

6 Q Okay. And he -- what was his response?
7 What was Devon's response to that?

8 A Chill, calm down, you know, the usual --

9 Q Okay.

10 A -- male response when females are like
11 what are you doing --

12 Q Okay.

13 A -- why are you being stupid.

14 Q Okay. You may recall that Officer Gilbert
15 talked to you about what he observed to be y'all
16 passing some stuff back and forth from the backseat
17 to the front seat.

18 What was that?

19 A My best guess would be it was Erica with
20 her book --

21 Q Okay.

22 A -- leaning forward. The other thing, what
23 she told me at a later date when e discussed this
24 around Christmastime last year, I believe, she
25 didn't want to mention it because she didn't want to

1 get in trouble, but she didn't have her seatbelt on;
2 so she was attempting to pull on her seatbelt.

3 Q Okay.

4 A She's like maybe it was that.

5 Q Okay. Did she pass you anything from the
6 backseat to the front seat?

7 A No.

8 Q And did you observe her pass anything to
9 Devon Beazer from the backseat to the front seat?

10 A No.

11 Q Okay. And I think Mr. Beazer said that
12 the car that he was driving was his brother's car?

13 A No. It was his car.

14 Q Okay.

15 A His brother was the only other person
16 who'd been in it and been out without him.

17 Q Okay. So that was Devon's car that he was
18 driving?

19 A Yes.

20 Q Okay. When had his brother been in it?

21 A Maybe a week earlier.

22 Q Okay.

23 A I'm not -- don't quote me on the date.

24 Q Okay. Why did his brother drive his car?

25 A His brother didn't drive his car. He

1 **drove his car, but his brother was in it.**

2 Q Oh, gotcha.

3 A **Yeah.**

4 Q And where were they going?

5 A **Just the store.**

6 Q Okay. What store? Like, the grocery
7 store?

8 A **Yeah, the grocery store, Publix.**

9 Q Okay. Did Devon's brother have a car?

10 A **I honestly can't remember.**

11 Q Okay.

12 A **I guess apparently not if he was using
13 Devon's, but I'm not sure.**

14 Q Okay.

15 A **And if he wasn't using Devon's, Devon
16 would just cart him around everywhere.**

17 Q Okay. Do you recall Devon providing the
18 response to Officer Gilbert that the car was
19 actually his brother's car?

20 A **No. They actually spoke away from me and
21 Erica.**

22 Q Okay. If he said that, can you think of a
23 reason why he would say that?

24 A **No.**

25 Q Okay.

1 A No. The car -- the car was his. I think
2 he said he'd cleaned it after his brother was in.

3 Q Okay.

4 A That's what he said to me. Because I know
5 he cleaned it before we picked up Erica at the
6 airport. There were a lot of food crumbs and stuff
7 in that thing.

8 Q I have small children, so I can't --

9 A Yeah.

10 Q -- I can't criticize on that basis.

11 A Well, he didn't have small children, so no
12 excuse.

13 Q Uh-huh (affirmative). Okay.

14 Do you recall Officer Gilbert talking to
15 you and Erica about a scent of marijuana in the car?

16 A Yes.

17 Q Okay. Did you smell marijuana in the car?

18 A No.

19 Q Okay. Where do you think the scent of
20 marijuana was coming from?

21 A I was a smoker, cigarette smoker.

22 Q Okay.

23 A I had a pack of Salem Lights.

24 Q Okay.

25 A And if I remember correctly, I had

1 **outtened a cigarette because I didn't want to litter**
2 **when we got pulled over. I'd outtened the cigarette**
3 **on the bottom of my shoe and put the cigarette butt**
4 **in the box.**

5 Q In what box?

6 A **The cigarette box.**

7 Q Oh. Oh, okay.

8 A **In the cigarette pack so I didn't litter.**

9 Q Okay.

10 A **The bottom of my shoe and.**

11 Q Okay. When did you put the cigarette out?

12 A **I'm not sure. In relation to everything,**
13 **I'm not sure.**

14 Q Was it when y'all were coming to a stop
15 after the officer put on his lights?

16 A **Probably.**

17 Q Okay.

18 A **I thought smoking a cigarette wouldn't**
19 **have been a good idea if somebody come up to the**
20 **window.**

21 Q Okay. So you put the cigarette out --

22 A **Uh-huh (affirmative).**

23 Q -- and put it in your cigarette box?

24 A **Yeah.**

25 Q Okay. And where did you put your

1 cigarette box?

2 A My best guess would be next to my thigh.

3 Q Okay.

4 A I always put my cigarettes and phone and
5 stuff in the car next to my thigh for some reason.

6 Q So it would've been sitting in the seat
7 next to you?

8 A Yeah.

9 Q Okay. Was Erica smoking a cigarette when
10 y'all were pulled over?

11 A She might have been. When she comes in
12 she mooches cigarettes off me sometimes.

13 Q Okay.

14 A I don't remember if she had then or not.

15 Q Okay. And was Devon smoking a cigarette?

16 A No. Devon doesn't smoke.

17 Q Okay.

18 A Erica's not really a smoker but social
19 smoker, I guess.

20 Q Okay. Had you smoked any pot that night?

21 A No.

22 Q And what about Erica? Had she smoked pot?

23 A No.

24 Q Okay. What about during her visit with
25 you, had she smoked any pot?

1 **A No.**

2 Q Okay. And what about you?

3 **A No.**

4 Q Okay. What about Devon?

5 **A No.**

6 Q Okay. Devon's brother, does he smoke pot?

7 **A Not that I'm aware.**

8 Q Okay.

9 **A I made it kind of a point to not spend**
10 **time with him.**

11 Q Okay. What is your relationship with
12 Devon's brother? Why did you not want to spend time
13 with Devon's brother?

14 **A He seemed less than intelligent, was kind**
15 **of annoying, and I can't describe why. I'm trying**
16 **to remember why I found him annoying, but I know**
17 **that I was annoyed and I went out of my way to avoid**
18 **him. Oh, oh. Because he kept doing stupid stuff,**
19 **like taking apart the TV to try and fix something**
20 **and leaving parts everywhere. I have a little dog.**

21 Q Uh-huh (affirmative).

22 **A So he was, like, creating a job -- an**
23 **extra job for me with Loxley to constantly have to**
24 **keep him out of there to keep him away from things.**

25 Q Uh-huh (affirmative). Anything else that

1 he did that bothered you?

2 **A No.**

3 **Q Okay.**

4 **A I don't really remember much else because,**
5 **like I said, I tried to avoid him.**

6 **Q You just didn't get along with him?**

7 **A He would just kind of annoy me if I hung**
8 **around him --**

9 **Q Okay.**

10 **A -- any longer, so I just --**

11 **Q How long was he there?**

12 **A About two weeks.**

13 **Q Okay.**

14 **A A week or two. It was annoying.**

15 **Q And was this a one-bedroom apartment? A**
16 **two-bedroom apartment?**

17 **A Two-bedroom.**

18 **Q Okay. And where did he stay?**

19 **A The spare room.**

20 **Q Okay. And so you were staying with Devon?**

21 **A Yeah.**

22 **Q Okay.**

23 **A And Loxley.**

24 **Q Okay. Was he there at the same time Erica**
25 **was there?**

1 **A No.**
2 Q Okay. So he had left by the time Erica
3 came --

4 **A Yeah.**

5 Q -- to visit? Okay.

6 What did you have to eat at that
7 restaurant the night before -- the night of the
8 arrest?

9 **A This horrible onion soup. I thought it**
10 **was gonna be French onion soup from the way the menu**
11 **made it sound.**

12 Q Okay.

13 **A It was more like onion porridge.**

14 Q Okay.

15 **A It was disgusting.**

16 Q Okay. Do you remember what Erica had to
17 eat?

18 **A No.**

19 Q What about Devon?

20 **A No.**

21 Q Did you have anything to drink when you
22 were at the restaurant?

23 **A They got soda and water, I believe, and I**
24 **had two beers.**

25 Q Okay. Did y'all go anywhere after the

DEPOSITION OF RENEE SCHROEDER BUTTS 12/18/2014
RENEE SCHROEDER vs. CALEB GILBERT

1 restaurant to eat or drink anything?

2 **A No. We went shopping.**

3 Q Okay. And that's when you went to T.J.
4 Maxx and Marshalls and Barnes & Noble?

5 **A Yes.**

6 Q Did you go to any other stores?

7 **A Not that I recall. I know Erica had**
8 **wanted to make up for the record store being closed**
9 **by going a whole bunch of other places and spending**
10 **money.**

11 Q Okay. Where did she want to go?

12 **A T.J. Maxx, Marshalls, and we both agreed**
13 **on Barnes & Noble.**

14 Q Okay.

15 **A We'd just been shopping the day before. I**
16 **was -- I'd had enough clothes shopping.**

17 Q What do you recall about Officer Gilbert
18 taking a look at the pill bottle, the William
19 Schroeder pill bottle, during the traffic stop,
20 during his investigation of the traffic stop?

21 **A He asked me why I had someone's**
22 **prescription.**

23 Q Uh-huh (affirmative).

24 **A And I said I don't clean out my purse.**

25 Q How did he come to know that you had

1 someone's prescription? What do you recall about
2 that?

3 A He asked if I had drugs or anything, and I
4 said I have one of my prescriptions and I have my
5 husband's prescription.

6 Q Okay.

7 A Because, you know, I didn't know he meant
8 prescriptions, whatever.

9 Q Uh-huh (affirmative). And why did you
10 have Mr. Schroeder's prescription medication in your
11 purse?

12 A It was my travel purse.

13 Q Okay.

14 A And after we left Pennsylvania, he
15 generally only -- well, even before that he only
16 took his medication when we traveled mostly when he
17 was prescribed anxiety stuff.

18 Q Okay. What's a travel purse? Because --

19 A It's a big purse with a zipper --

20 Q Okay.

21 A -- that holds a bunch of junk --

22 Q Okay.

23 A -- that kind of makes it nice for travel
24 because I know nothing's gonna fall out of it.

25 Q Okay.

1 **A And, again, I can take those extra items.**

2 **Q Did you have a purse other than your**
3 **travel purse in Georgia with you?**

4 **A No. I just grabbed my travel purse to**
5 **kind of --**

6 **Q Okay.**

7 **A Took what I needed and.**

8 **Q Where was your other purse, purses**
9 **probably?**

10 **A Purses, lots of purses. At the house in**
11 **Greenville where I had lived with Bill.**

12 **Q Okay. And when you moved in with Shawn**
13 **Brown and then Mr. Beazer, did you move -- did you**
14 **leave a good portion of your belongings in**
15 **Greenville, North Carolina?**

16 **A Yes.**

17 **Q Okay. Okay.**

18 **A At the house with Bill. Some of it was at**
19 **the house with Shawn. But, like I said, with Shawn**
20 **I kind of -- he crossed a boundary, and I was in a**
21 **hurry to get out of there.**

22 **Q Uh-huh (affirmative). Okay.**

23 **A So I kind of filled up my trunk, threw**
24 **stuff in my big purse and left.**

25 **Q Okay. What was William Schroeder**

1 prescribed Clonazepam for?

2 **A Anxiety. He was having some issues, I**
3 **guess, at work as well. He worked a high-pressure**
4 **job as a chemical engineer.**

5 **Q Okay.**

6 **A Sometimes worked 20-hour days.**

7 **Q Okay.**

8 **A Which I understand is against regulation,**
9 **but they had him do it anyways.**

10 **Q When was he first prescribed antianxiety**
11 **medication?**

12 **A I honestly can't remember.**

13 **Q Okay.**

14 **A To the best of my recollection, it was**
15 **after me.**

16 **Q Okay.**

17 **A He saw me being calm after -- you know,**
18 **when I would start to panic.**

19 **Q Okay. So it was after y'all started**
20 **dating or?**

21 **A Yeah.**

22 **Q Okay. So he had been on the medication**
23 **since -- when would that have been? '08? '09? Do**
24 **I have that right?**

25 **A Probably. It was after I was. I know**

1 that.

2 Q Okay.

3 A But don't quote me exactly on that. I'm
4 trying to remember and it's --

5 Q What type of anxiety did he -- it was
6 work-related?

7 A Yes.

8 Q Okay. And what happened when he would get
9 anxious?

10 A I didn't talk to him much about it. I
11 wasn't there at work, but I know he was often
12 stressed out. He would curse a bit and stuff
13 because his pager would sometimes go off at 2:00
14 o'clock in the morning.

15 Q Okay.

16 A And it sounds like the fire alarm.

17 Q Okay.

18 A He was constantly on call 24/7 and stuff
19 was always breaking.

20 Q What other prescriptions was he taking?

21 A I believe he might have been on something
22 for allergies. I'm not sure.

23 Q Okay.

24 A But he didn't take that much.

25 Q Okay.

1 A I got stuck with the prescription because,
2 you know, he ended up using it when we traveled
3 because I really don't like airports and traveling.
4 I'd be stressed, he'd be stressed and we kind of --

5 Q Okay.

6 A It's like I've gotta put up with you or on
7 trips to visit the in-laws.

8 Q Did he take it on a regular basis?

9 A No. After we moved, no.

10 Q Okay. Before you moved did he take it on
11 a regular basis, like, every day at a certain time
12 of day?

13 A I don't think so. I think it was more as
14 needed --

15 Q Okay.

16 A -- if I'm correct.

17 Q Okay. And did it work that way for him,
18 that if he took one when he started to get stressed
19 out, that it would help calm him down?

20 A I hope so. Well, it seemed to be a little
21 bit better at the airports --

22 Q Okay.

23 A -- when we traveled because that was
24 always stressful with flight delays or.

25 Q Okay. The medication that you had with

1 you on August 2nd of 2013, do you know what the
2 dosage was on that? Do you know what the milligrams
3 were?

4 **A No.**

5 Q Okay. And I think that bottle was dated
6 2010.

7 Did he have a newer bottle at home with
8 him?

9 **A No.**

10 Q Okay.

11 **A That would've been the most recent.**

12 Q Okay. So did he --

13 So did his last a long time like yours
14 did?

15 **A Yeah, yeah.**

16 Q Okay.

17 **A We were both a lot less stressed after we
18 moved.**

19 Q To North Carolina?

20 **A Yeah.**

21 Q Okay. Did he take the anxiety medication
22 when he was in North Carolina with you?

23 **A Only when we traveled.**

24 Q Okay. So it was the travel that triggered
25 it for him?

1 **A Yes.**

2 **Q Okay.**

3 **A The travel and visiting in-laws.**

4 **Q Okay. Was it air travel or just car**

5 **travel or just travel altogether?**

6 **A Air travel, sometimes car travel.**

7 **Q Okay.**

8 **A And definitely, definitely visiting**

9 **in-laws.**

10 **Q Okay. So him visiting your parents?**

11 **A (Witness nods head affirmatively).**

12 **Q And you visiting his parents?**

13 **A No, just him visiting mine.**

14 **Q Okay. Okay. Did he not get along with**

15 **your parents?**

16 **A Oh, he did but, you know, girls and**

17 **mothers.**

18 **Q Uh-huh (affirmative).**

19 **A He would be there. And, you know, my**

20 **family does have a tendency to nag sometimes and**

21 **be --**

22 **Q Okay.**

23 **A -- persistent and a little chaotic.**

24 **Q Okay. So it was just a stressful**

25 **situation for him?**

1 **A Yes.**

2 **Q**Okay. Did he travel regularly with his
3 work in -- at DSM Dyne --

4 Was he working at DSM Dyneema when y'all
5 moved to North Carolina? Is that where he moved to
6 work?

7 **A Yes.**

8 **Q**Okay. Did he travel regularly for them?

9 **A Not regularly. We did go on a trip to the**
10 **Netherlands.**

11 **Q**Okay.

12 **A He brought me.**

13 **Q**Okay. And is that the only trip that you
14 recall that involved air travel?

15 **A No. We took a trip to New Orleans.**

16 **Q**Okay.

17 **A And I'm trying to think if there were some**
18 **other instances there. I know we did a cruise.**

19 **Q**Okay.

20 **A I know we drove into Pennsylvania --**

21 **Q**Okay.

22 **A -- when we'd come home to visit.**

23 **Q**What about after you moved out? Do you
24 know if he traveled at all?

25 **A I don't know.**

1 Q Okay.

2 A I think he went to -- he might have went
3 camping with his brother.

4 Q Okay.

5 A But I believe they just drove.

6 Q Do you think he went anywhere on an
7 airplane?

8 A He did go to interview on a job maybe this
9 past Summer.

10 Q Okay.

11 A Last -- this past Summer or Spring.

12 Q Okay. What about between -- and correct
13 me if I have the wrong timeframe -- but, say, March
14 2013 to August 2013, do you know of him traveling
15 anywhere?

16 A I don't believe so.

17 Q Okay.

18 A Oh. He did have to go on one -- on one
19 trip, but I don't believe it was air travel. I
20 believe it was a road trip when he went maybe with
21 his brother.

22 Q Okay.

23 A And I had to stay and watch the dogs, but
24 that was, like, a camping --

25 Q Okay.

1 **A -- just go drive somewhere and go camp,**
2 **so.**

3 **Q Would he take the anxiety medication when**
4 **he was working those long days at his job?**

5 **A Not after we moved to -- not after he**
6 **moved to DSM.**

7 **Q Okay. Was DSM a less-stressful job?**

8 **A It seemed -- he seemed a lot happier**
9 **there.**

10 **Q Okay. Okay. The pill bottle in your --**
11 **in your travel purse, is that the only pill bottle**
12 **that he had containing Clonazepam in the house in**
13 **North Carolina?**

14 **A I don't know.**

15 **Q Okay.**

16 **A I know that he had it for trips, so.**

17 **Q Okay. Okay. Did you ever pick up his**
18 **prescription for him from the pharmacy?**

19 **A I'm sure I must have because I did a lot**
20 **of errands.**

21 **Q Okay.**

22 **A I did a lot of errands and I know I made**
23 **pharmacy trips, like, to pick up my skin medicine --**

24 **Q Uh-huh (affirmative).**

25 **A -- when just creams and stuff was**

1 prescribed, so I would venture I picked up his
2 prescription, too --

3 Q Okay.

4 A -- if he needed anything, but I don't
5 think he was really refilling it in North Carolina.
6 I don't think so. Don't quote me.

7 Q Okay. Was he taking --

8 Was he going to any type of counseling or
9 any type of therapy when y'all lived in
10 Pennsylvania?

11 A I think he just went to the general
12 practitioner --

13 Q Okay.

14 A -- is what I believe, if I recall
15 correctly.

16 Q And what about in North Carolina? Any
17 counseling or therapy that he attended?

18 A No.

19 Q Okay. Are you aware of him attending
20 anything like that now?

21 A No.

22 Q Okay. I think on the video -- and we may
23 take a look at that in just a few minutes. But on
24 the video, on the way back to the jail, I recall you
25 making a comment that you had dumped Devon that

1 night. Is that right?

2 A I was blaming him for it because remember
3 as how I said he was stupid --

4 Q Okay.

5 A -- or less than intelligent. He was
6 not -- I don't -- I don't remember him swerving or
7 anything particularly then, but I've known he's not
8 the best driver and, like, what was he -- I was
9 still wondering what he was doing driving two miles
10 an hour to pull over.

11 Q Uh-huh (affirmative).

12 A And I kind of blamed a lot of it on him,
13 and it's just like you're actually so stupid, that
14 you're a danger to other people.

15 Q When did you break up with him?

16 A While we were standing by the car.

17 Q Okay.

18 A It just --

19 Q What was his response?

20 A He just looked at me, but I don't remember
21 exactly what he said.

22 Q Okay.

23 A I don't remember exactly what he said
24 there. He just -- yeah. I just said he was so
25 stupid, that he was a danger to other people.

1 Q Okay. Did you -- did you send any text
2 messages while you were standing by the police car?

3 A To Bill --

4 Q Okay.

5 A -- my husband.

6 Q Okay. And what did you text him?

7 A It was something to the -- I can't give
8 you verbatim, but it was something to the effect of,
9 oh, my god, I've been pulled over, I had no idea
10 that they would classify me having your prescription
11 on me as a felony.

12 Q Okay. Did you text him before or after
13 Officer Gilbert tried to call him?

14 A I can't remember.

15 Q Okay.

16 A I don't -- I'm sorry.

17 Q Did he respond?

18 A To me?

19 Q Uh-huh (affirmative).

20 A Not that night.

21 Q When did he respond to you?

22 A When I got my phone back, there was a
23 response.

24 Q And when was it timestamped?

25 A I don't remember. Probably Saturday. I

1 **would guess Saturday.**

2 Q Okay.

3 A **Something to the effect of me cleaning**
4 **my -- not cleaning purses ever.**

5 Q Okay. Anybody else you texted during the
6 traffic stop?

7 A **I don't think I texted Chad, but Chad**
8 **texted me because we texted before -- Chad was an**
9 **old friend from my creative-writing program --**

10 Q Uh-huh (affirmative).

11 A **-- one of the people I was looking forward**
12 **to hanging out with again. He was sending me a text**
13 **about some stuff going on at his church.**

14 Q Okay.

15 A **I guess he responded during the traffic**
16 **stop, but I didn't get to read that until I got my**
17 **phone back.**

18 Q Okay. Anybody else you sent a text to
19 during the traffic stop?

20 A **Just Bill during the traffic stop --**

21 Q Okay.

22 A **-- that I recall.**

23 Q Okay.

24 A **Because I know I was texting my mother and**
25 **Chad beforehand.**

1 Q Were you texting Bill at the phone number
2 that Officer Gilbert called?

3 A Yes.

4 Q Okay.

5 A (570) 436-6855.

6 Q Okay.

7 A But, yeah. Any other numbers he had I --
8 probably his work numbers, his work phones or phone.
9 I don't know.

10 Q The Prozac that you're currently
11 prescribed, have you taken that today?

12 A No.

13 Q Okay. And what about the other medi --
14 the other prescription?

15 A No. In fact, I didn't take them for the
16 last few days. I was afraid of having any kind of
17 prescription in my system --

18 Q Okay.

19 A -- coming down here.

20 Q Okay. So what is the other one called
21 again? I --

22 A Prazosin.

23 Q And what is it for?

24 A It's supposed to help me with the
25 nightmares.

1 Q Okay.

2 A Apparently they -- from what my
3 psychiatrist said, that they use it -- that it's
4 used to help treat Vets with PTSD. Then it's
5 really, like, a blood-pressure thing or something.

6 Q Okay. So you haven't taken any medication
7 today?

8 A No, not for a few days.

9 Q Okay. What time did you leave to go to
10 the airport in Pennsylvania so you could fly here?

11 A At around 3:00.

12 Q Super early?

13 A 3:00/3:30.

14 Q A.m.?

15 A Yes.

16 Q Okay. And what time did your flight get
17 in?

18 A We arrived here around 9:00 a.m.

19 Q Okay. And then you're leaving when? Is
20 it 8:00 or something like that? Do I have that
21 right?

22 A Well, sometime this evening. My mom's in
23 charge of flight schedules.

24 Q Okay.

25 A I kind of left all the planning to her.

DEPOSITION OF RENEE SCHROEDER BUTTS 12/18/2014
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1 Q Okay.

2 A **She's way more organized.**

3 Q What airline did you fly? Do you
4 remember?

5 A **Private.**

6 Q Oh, okay.

7 A **Yeah.**

8 Q Is that something related to Cee Kay Auto
9 Parts that your --

10 A **No.**

11 Q Okay.

12 A **Just a family friend.**

13 Q Okay. Who's the family friend?

14 A **Mike Gallagher. He's a pool guy, but he's
15 also involved in the -- in the airport thing. I
16 don't know a lot about it. I've kind of been cut
17 off from everybody since I've come home.**

18 Q He's a pool guy? Is that what you said?

19 A **He's a pool guy, but he's also involved in
20 airport stuff.**

21 Q Like, he installs pools?

22 A **He take -- I believe he did the liner, but
23 he comes and cleans the pool.**

24 Q Oh.

25 A **He comes and cleans the pool.**

1 Q He really is a pool guy?

2 A Yeah.

3 Q Okay.

4 A And he's also involved in some stuff at
5 the airport, but he got -- he got to leave to get a
6 flight down.

7 Q Okay. And he owns a jet?

8 A I don't know if he owns it or the company
9 he's involved with does. I don't know all the
10 particulars.

11 Q Okay.

12 A I really haven't asked. Like I said, I
13 just know that they talked -- they discussed all
14 this at a Christmas party I was supposed to attend,
15 but I didn't go.

16 Q Where did you fly into, what airport?

17 A I don't know.

18 Q But it wasn't Hartsfield?

19 A I didn't --

20 Q It wasn't -- it wasn't the big, giant
21 airport in Atlanta?

22 A No, not a big airport.

23 Q Okay. Would it have been Peachtree DeKalb
24 Airport?

25 A (Witness shakes head negatively).

DEPOSITION OF RENEE SCHROEDER BUTTS 12/18/2014
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1 Q Was it a small airport?

2 A Yes.

3 Q Okay. How long did it take you to get
4 here from the airport?

5 A **Maybe ten minutes.**

6 Q Okay.

7 A **Sorry. I'm kind of fuzzy on details.**

8 Q That's okay. So how does Mike Gallagher
9 know your family?

10 A **I don't know. He was our pool guy when I
11 was a little kid.**

12 Q Okay. Do your parents still have a pool
13 at their house?

14 A **My mother does, yes.**

15 Q Okay. And so Mike Gallagher understood
16 that you needed to come to Atlanta, so he offered to
17 fly you down here? Is that how it happened?

18 A **Yeah, and they said why don't you fly us
19 here I guess at a party. I wasn't there. It was
20 just --**

21 Q Okay.

22 A **From what my mother told me, she was at a
23 Christmas party at the hangar, the airport hangar
24 and --**

25 Q At Mike Gallagher's airport hangar?

1 **A** I don't know if he owns it or if Jimmy --
2 his brother Jimmy Gallagher owns it.

3 **Q** So they have a company?

4 **A** I believe so. I know they've been
5 involved in charter flights and stuff.

6 **Q** Okay.

7 **A** But I wasn't there at the party to hear
8 all the details. I've just heard things from my
9 mother, that the party was really good and I
10 should've went, so.

11 **Q** Okay. And is it your understanding he
12 offered to fly you down here, you and your mom?

13 **A** We're paying for it --

14 **Q** Okay.

15 **A** -- fuel and -- fuel cost at least.

16 **Q** Okay. So you're paying for fuel cost?
17 What was the -- what was the -- never mind.

18 **A** If it's anything financial or whatever, my
19 mother's been handling all that.

20 **Q** Okay. Was Mike Gallagher the pilot?

21 **A** No.

22 **Q** Okay. Do you know the pilot?

23 **A** No.

24 **Q** Okay. So it's just --

25 **A** I can't even remember the guy's name.

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1 Q Okay. Were y'all the only people on the
2 flight?

3 A **Yes.**

4 Q Okay.

5 A **Just me and my mom, pilot and co-pilot.**

6 Q Okay. After your arrest you were -- you
7 drove to the jail, Officer Gilbert drove you to the
8 jail --

9 A **Yes.**

10 Q -- in the patrol car?

11 Was Officer Gilbert respectful to you
12 while he was driving you to the jail?

13 A **Yes. He was very polite.**

14 Q Okay. And what about during the arrest
15 itself? Was he respectful to you while he was
16 arresting you, aside from the fact that you were
17 being arrested? I understand that that was
18 stressful, but.

19 A **I mean, he was very firm.**

20 Q Okay.

21 A **Respectful? Sorry. English major here
22 gonna try and define that term.**

23 Q Well, you can use a different word if
24 you -- if you --

25 A **I feel things happened that shouldn't have**

1 happened.

2 Q Like what?

3 A Well, nobody was smoking pot, so I don't
4 know where the marijuana smell came from.

5 Q Okay.

6 A I mean, just the fact I was there to be a
7 teacher, I wouldn't throw away my whole education
8 driving around doing something illegal. And I had
9 two beers. It was four hours earlier. I wasn't --
10 there's no way I would drive. I had my seatbelt on.
11 I didn't litter by throwing a cigarette out the
12 window. I've always learned -- like, given my
13 background, I always had to watch my reputation.

14 Q Okay.

15 A So there was no pot going on, like, just
16 different things like that. I don't know. I'm not
17 sure what to say, honestly.

18 Q What happened once you got to the jail?

19 A They made me stand against a wall with my
20 hands on the wall, and people I didn't know ran
21 their hands up and down my body.

22 Q Was it a female?

23 A Yes.

24 Q Was it one female?

25 A I don't remember.

1 Q And were you in a -- in a private area?

2 A No.

3 Q Okay.

4 A It was right in the front by the -- the
5 check-in area.

6 Q Okay.

7 A It was right there. People outside I
8 believe could see me.

9 Q Okay. And then what happened?

10 A They put me in a room called the tank.

11 Q Okay.

12 A And the --

13 Q Have you ever heard that term used before
14 about a jail?

15 A I don't know much about jails.

16 Q Okay.

17 A I think fish in tanks are animals, not
18 people. And there were metal cots against the wall
19 or metal pallets. And the tank was horrible. There
20 were people there who -- some people were crying.
21 There was a woman there screaming don't look at me,
22 don't look at me, don't look at me. I was afraid to
23 look at her. I just kept my head down. I was
24 scared if I was -- I didn't know what was gonna go
25 on. And there was a toilet there in the center of

1 the room with a low wall around it.

2 Q Uh-huh (affirmative).

3 A And it seems if the male guards walking by
4 could see the women.

5 Q Uh-huh (affirmative).

6 A They could at least see their heads and
7 shoulders while they relieved themselves. I don't
8 know if there was a way at all to see from the
9 front.

10 Q And then did you spend the night there?

11 A In the tank.

12 Q Okay. Did you call your mom? Who did you
13 call?

14 A I called my mother.

15 Q Okay. And what did she -- what did y'all
16 discuss happening?

17 A I discussed that I was arrested because of
18 Bill's prescription. And my mother said you've got
19 to be kidding me, that's ridiculous, why are you
20 there. And I said, I want to -- I'm scared, I want
21 to come home, I want to come home.

22 Q And what did she say she would do?

23 A She said she was gonna get a lawyer.

24 Q Okay. And who did she contact?

25 A Elizabeth Vila Rogan, and she just found

1 her on Google. It was -- like, I didn't --

2 Q Is her name R-O-G-A-N (spelling)?

3 A Yes.

4 Q Okay. And where did --

5 What happened next? Did --

6 A Well, in the tank they removed me for a
7 little bit and.

8 Q Why?

9 A They jammed me with needles to do
10 different kinds of tests, to take blood and they --
11 or I don't know what they did. I just know there
12 were needles, and I hate needles.

13 Q Okay.

14 A And --

15 Q What did they tell you they were doing?

16 A I don't remember. They just asked me what
17 medications and stuff.

18 Q Okay.

19 A They didn't really say too much. And then
20 they, you know, made me do a drug test with a cup in
21 the ladies room.

22 Q Okay.

23 A And then they put me back in the tank --
24 in the tank with the people who were screaming, and
25 I just remember there was a -- there was a ratty

1 romance novel on the floor. I wasn't allowed to
2 bring any of my own books, not like I'd have been
3 able to concentrate.

4 Q What was the name of the book?

5 A I don't even remember. It seemed an older
6 sort given the cover art.

7 Q What was on the cover art?

8 A Oh, just a coin with a woman leaning
9 back --

10 Q Uh-huh (affirmative).

11 A -- in the guy's embrace, which I know is a
12 popular style on more of the older covers than the
13 newer ones.

14 Q Okay.

15 A The newer ones do the bare-chested guy
16 with the top of his head, with the eyes not visible.

17 Q Did you read it?

18 A No.

19 Q Okay.

20 A No.

21 Q You just observed it there?

22 A I observed it. Part of me -- when I'm in
23 a stressful situation or something, I distance part
24 of myself and try and recall -- try and memorize
25 details of things, maybe I might use them in writing

1 or something --

2 Q Okay.

3 A -- different smells, different sounds.

4 Then they took me out of there again to
5 dress in, as they called it, and this woman who was
6 much larger than me took me to this locker room.
7 Oh, god. And she made me remove all my clothes in
8 front of her, and then she made me squat in front of
9 her facing away from her and open my rear and cough.

10 Q Uh-huh (affirmative).

11 A They took all my possessions, all my
12 clothes. I'm sorry. They took my purse.

13 COURT REPORTER: I'm sorry.

14 THE WITNESS: I'm sorry.

15 BY MS. COWAN:

16 Q If we need to take a break, we can, too.

17 A No. I'm fine.

18 Q Okay.

19 A They just took everything because I didn't
20 clean out the purse.

21 Q Uh-huh (affirmative).

22 A Then they put me back in the tank, and I
23 laid there on the -- on the floor because all the
24 pallets were taken. I laid there on the floor
25 shivering underneath a blanket with holes in it near

1 the toilet.

2 Q Did Ms. Rogan come see you at the jail --

3 A No.

4 Q -- or how did you end up getting out?

5 A My mother called a bunch. Then Officer
6 Gilbert took me to my first appearance before the
7 judge.

8 Q Okay.

9 A And then they got me out on ROR.

10 Q Okay.

11 A I believe that's what it's called.

12 Q When was your first appearance?

13 A That Saturday.

14 Q Okay.

15 A The Saturday after.

16 Q Okay.

17 A And then when we got back, Officer Gilbert
18 was nice enough to ask them, you know, how long did
19 it usually take to get out.

20 Q Uh-huh (affirmative).

21 A And I believe they said between six to
22 twelve hours, eight hours maybe.

23 Q Okay.

24 A I got out over 24 hours later.

25 Q Okay.

1 **A Waiting and waiting and waiting.**

2 **Q**Okay. Did you see Officer Gilbert again
3 after he had asked that question on your behalf?

4 **A No.**

5 **Q**Okay. And who came to get you? Who came
6 to pick you up?

7 **A Erica and Devon.**

8 **Q**Okay. Okay. And where did y'all go?
9 What did you do?

10 **A Back to Devon's house.**

11 **Q**Okay.

12 **A The first thing I did was lock the**
13 **bathroom door and sit in the tub and just scour**
14 **myself.**

15 **Q**Okay.

16 **A I felt so dirty.**

17 **Q**When did you first meet with Ms. Rogan?

18 **A Actually, I never met Ms. Rogan in person.**

19 **Q**Okay.

20 **A We just spoke on the phone.**

21 **Q**Okay. When did you first speak to her on
22 the phone?

23 **A The day after I was out of there.**

24 **Q**Okay. How did you get in contact with
25 her? Did you call her or did she call you?

1 **A** I don't particularly remember.

2 **Q** Okay.

3 **A** That -- the day after I think I was --
4 spent most of the day sitting in a corner with a
5 blanket and a beer.

6 **Q** Okay. But you never met with her in
7 person?

8 **A** No.

9 **Q** Okay.

10 **A** Just spoke to her a bunch on the phone.

11 **Q** Okay. Have you ever met with her in
12 person?

13 **A** No.

14 **Q** Do you know where her office is?

15 **A** No.

16 **Q** Did she speak with the D.A.'s office on
17 your behalf?

18 **A** She said she did.

19 **Q** Okay.

20 **A** She said she'd handle everything and not
21 to worry about it.

22 **Q** Okay. How long were you here in Georgia
23 after you got out of DeKalb County Jail?

24 **A** Not very long, as soon as Elizabeth
25 gave -- I don't remember the exact timeframe. As

1 soon as Elizabeth told me I could go home.

2 Q Okay.

3 A Mom flew down and drove my car. I was
4 afraid to drive.

5 I don't remember the exact timeframe. But
6 as soon as she said it was okay, I just told her to
7 come.

8 Q And did you go back to Pennsylvania?

9 A Yeah.

10 Q What did you do between the time you got
11 out of DeKalb County Jail and the time you went
12 home, just daily?

13 A Just I think, from what I remember, it
14 involved sitting in the corner.

15 Q Okay.

16 A And talking to my mom, saying what am I
17 gonna do, is my life over.

18 Q Okay. I saw some notes -- your attorney
19 gave me some records, some medical records, and I
20 saw a reference to a sexual assault after you left
21 the jail.

22 A Yes.

23 Q Can you tell me a little bit about that?

24 A Let me take a deep breath here because
25 it's a little rough to talk about.

1 Q Sure.

2 A Erica left, and I was alone with Devon. I
3 didn't want to be touched after the things that were
4 done to me.

5 Q Uh-huh (affirmative).

6 A Erica left, and Devon was drinking. And
7 I -- he doesn't normally drink much other than maybe
8 a few sips of my beer before that, but he was
9 drinking the rum that I got to mix with soda on
10 occasion. He drank half a bottle or more.

11 Q He'd had half a bottle of rum?

12 A Yeah. And I was like, oh, please, please,
13 please don't drink yourself and just -- I was
14 worried he was gonna, like, drink himself to death
15 or we'd have to call a hospital and then the police
16 were gonna be there, and the last thing I wanted was
17 to see police again. I was afraid that I'd be
18 hauled back to DeKalb for -- I don't know. I don't
19 know. I didn't know what I was thinking.

20 And, like I said, Devon at this point, I
21 ascertained that he was so dumb as to be a danger,
22 but where else am I gonna go at this point in
23 Georgia. I was kind of stuck.

24 Devon met somebody at Publix. I don't
25 know what the deal was. But he's like, oh, the guy

1 seemed really nice and wants to hang out. I'm like
2 who meets people in a grocery-store line. Nobody.
3 He's like, well, I'm gonna go meet this guy at,
4 like, 9:00 o'clock at night in Publix parking lot.
5 I'm like that doesn't sound shady to you, that
6 doesn't sound shady to you, plus, he'd been
7 drinking. So he's gonna go meet some shady guy
8 after drinking, and I'm like I just want to go home,
9 wait to do anything else stupid until I go home,
10 please, please, please. And I was afraid if he went
11 and what if this guy was a drug dealer, who knows
12 what. I was afraid it would look bad on me. I was
13 afraid it would look bad on me, and I was afraid
14 that I would end up going back to jail. I don't
15 know how, but it happened before. And he made me --
16 in order for him not to go, he made me sleep with
17 him.

18 Q Okay.

19 A And he made me --

20 Q So that was Devon?

21 A Yeah. And I told him to stop, and he
22 wouldn't stop and he wouldn't stop. He kept telling
23 me to chill. He said, chill, chill, it's fine; but
24 it wasn't -- it wasn't fine.

25 Q Okay.

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1 **A It was awful.**

2 **Q Do you want to take a break for a second?**

3 **A No, no. My mother's gonna wonder why I'm**
4 **crying.**

5 **Q Well, that's okay. We can take a break in**
6 **here if you want.**

7 **A I'm okay. She doesn't --**

8 **That's why Devon and I don't talk anymore.**

9 **Q Okay.**

10 **MR. FILIPOVITS: Yeah. Don't even**
11 **worry about that. Can I get you something**
12 **written from her --**

13 **MS. COWAN: Well --**

14 **MR. FILIPOVITS: -- if you really have**
15 **to go into this any further?**

16 **MS. COWAN: Yeah. I don't really think**
17 **that I need to.**

18 **MR. FILIPOVITS: Okay.**

19 **MS. COWAN: Except I may want to ask**
20 **one more question, and it will be not**
21 **involving the actual situation itself, so.**

22 **THE WITNESS: I'm sorry.**

23 **MS. COWAN: It's okay.**

24 **THE WITNESS: I feel like an idiot.**

25 **MS. COWAN: No, no, no.**

3 MS. COWAN: That's okay. Yeah.

4 A I just feel like I was left there and just
5 helpless after this happened and just I felt like I
6 had no rights and I couldn't do anything and it's
7 still (inaudible) --

8 MS. COWAN: Let's go off the record for
9 just a second. I'll let you calm down.

10 (Whereupon, there was a recess
11 in the deposition from 1:38 to
12 1:47.)

13 MS. COWAN: I just have one more
14 question related to that, and it is not
15 about any factual stuff.

16 THE WITNESS: Okay.

17 BY MS. COWAN:

18 Q I just want to know if you reported the
19 sexual assault to anyone, to the police or to anyone
20 else?

21 A No. I was afraid to call the police.

22 Q Okay.

23 A I had been afraid to call the -- I've been
24 afraid of the police and I've just been like, you
25 know what, you go be stupid, it's not my problem,

1 but I didn't know what was gonna happen after
2 everything, so -- and I have discussed it with
3 friends afterwards.

4 (Thereupon, marked for identification
5 purposes, Defendant's Exhibit 4.)

6 BY MS. COWAN:

7 Q Okay. Defendant's Exhibit 4, if you'll
8 take a look at that.

9 A **Sure.**

10 Q It's records from Matthew Berger's office.

11 A **Oh, Matthew Berger's.**

12 Q And I was given those in discovery
13 responses.

14 A **I went down to sign this stuff.**

15 Q You went down to sign the HIPAA release?
16 Is that the medical release?

17 A **I had an appointment, yeah --**

18 Q Okay.

19 A **-- to go sign the release.**

20 Q Okay. When did you first visit a
21 psychiatrist or a therapist after your arrest?

22 A **When I realized I was not getting better
23 on my own, sometime last Spring.**

24 Q Okay.

25 A **I think maybe --**

1 Q So Spring of 2014?

2 A Yeah, Spring of 2014. I also don't like
3 to drive in the snow, so it was I believe after the
4 snows were gone. So maybe, like, March, March-ish I
5 started going to see Deb Pavlico.

6 Q Okay.

7 A She was a counselor.

8 Q And is she associated with a particular
9 medical office or --

10 A No.

11 Q -- an organization?

12 A No, just one of those places where you go
13 and sit and talk.

14 Q Okay.

15 A But we weren't making headway there, and
16 she said you really might go -- want to go see a
17 psychiatrist.

18 Q How many times did you see Deb Pavlico?

19 A I'm not a hundred percent sure.

20 Q Okay.

21 A I missed a few appointments. She's about
22 20 minutes away, and I'm afraid to drive, so.

23 Q Was it more than one appointment?

24 A Oh, yes.

25 Q And was it more than five appointments?

1 **A Most likely.**

2 **Q Was it more than ten appointments?**

3 **A I'm not sure.**

4 **Q Do you think it was less than ten?**

5 **A For -- I went every week or every two**

6 **weeks. I'm so sorry. I'm not too clear on this.**

7 **Q That's okay.**

8 **A I was still on my ex's insurance, so they**

9 **were paying for it.**

10 **Q So several times?**

11 **A Yes.**

12 **Q Okay. How did you get associated with**

13 **Dr. Berger?**

14 **A My mother's friend's nephew goes there.**

15 **Q Okay.**

16 **A And her friend said, you know, he's really**

17 **nice.**

18 **Q Okay.**

19 **A They're really nice there. And the other**

20 **thing was I had problems driving, and it's, like,**

21 **ten minutes away.**

22 **Q Okay.**

23 **A The location was convenient, and they do**

24 **psychiatrist and counseling at the same place.**

25 **Q Okay. Did Dr. Berger --**

1 Did you meet directly with Dr. Berger the
2 first time or someone else in his office?

3 **A No, Jill.**

4 **Q Jill? What's Jill's name?**

5 **A I'm not sure of her last name. She always**
6 **introduced herself as Jill.**

7 **Q Jill?**

8 **A Just Jill, yeah. I'm sorry.**

9 **Q Let's see if we can find it here.**

10 **A Hopefully, yeah. Hopefully she's in here**
11 **somewhere. Jill Cosgrove.**

12 **Q Cosgrove? And what is --**

13 **Is Jill Cosgrove a psychiatrist or?**

14 **A She's the assistant to Dr. Berger --**

15 **Q Okay.**

16 **A -- from what I understand. I'm sorry I'm**
17 **so unclear on these things. I just kind of go.**

18 **Q Okay. What did you go to see Deb Pavlico**
19 **for? What prompted you to go see her?**

20 **A I wasn't getting better on my own. The**
21 **fear of driving and the fear of going out was**
22 **getting worse.**

23 **Q Okay. What was -- what was happening**
24 **after you came back from Pennsylvania -- or came**
25 **back to Pennsylvania? I'm sorry.**

1 A Until the thing was dismissed, I was
2 sitting in my room crying a lot.

3 Q That was in Atlanta; right?

4 A Yeah.

5 Q Okay.

6 A Then I came back to Pennsylvania, and I
7 was still sitting in my room crying a lot. My
8 mother was very frustrated.

9 Q Okay.

10 A Because we had Elizabeth, and she told me
11 to go home. And my mother was frustrated. I was
12 afraid to be alone, so for a while -- my family's
13 mostly in the kitchen -- I slept on the floor in the
14 kitchen.

15 Q Okay.

16 A I didn't want to be alone.

17 Q What was your mom frustrated about?

18 A How afraid I was.

19 Q Okay.

20 A Because every time the door bell rang, I
21 thought it was maybe the cops --

22 Q Okay.

23 A -- or every time the dog barked. And
24 Loxley, my little Yorkie, was very antsy. Every
25 little thing he'd look, every little noise, what is

1 it, what is it, what is it. And I kept thinking,
2 oh, my god, the cop's gonna come -- the cop's gonna
3 come take me and I'm gonna go back to DeKalb.

4 Q Why was Loxley anxious? Does he usually
5 just bark whenever?

6 A **It's Yorkies.**

7 Q Okay. Okay.

8 A Yorkies are generally anxious dogs. And
9 it was fine before all this happened, but I get
10 bothered by loud noises and he was barking. And,
11 like I said, every time he barked -- he barked a
12 lot. I mean, oh, my gosh. I'd be running to the
13 window, I'm like, are the cops here. It sounds so
14 ridiculous I know, but Lox had to go stay with a
15 family friend --

16 Q Okay.

17 A -- because I just couldn't handle the
18 pain.

19 Q The noise? Okay.

20 A The -- yeah, just the constant bark, like,
21 the sharp barks.

22 Q Okay.

23 A And he was causing a lot of stress on me,
24 and I think he picked up on my anxiety.

25 Q Uh-huh (affirmative).

1 **A** And it fed him, and he'd done started the
2 behavior of peeing on the floor.

3 **Q** Uh-huh (affirmative).

4 **A** And I had him house-broken already, and
5 he -- so he ended up going to stay with a family
6 friend. At least I get to see him once in a while
7 and get pictures.

8 **Q** Okay.

9 **A** But he's happier.

10 **Q** And he still lives with the family friend?

11 **A** Yeah. He's --

12 **Q** Who's the family friend that he lives
13 with?

14 **A** Her name is Pat. She's the cleaning lady.

15 **Q** She's your family's cleaning lady?

16 **A** My mother's.

17 **Q** Okay.

18 **A** We've known her from -- my mom's known her
19 for a while.

20 **Q** Who lives at your mom's house with you and
21 your mom?

22 **A** My mother's boyfriend. I hate saying
23 boyfriend because they've been together for over 20
24 years.

25 **Q** Okay.

1 A I'm sorry, maybe just slightly under 20
2 years. Since I was 13 they've been together.

3 Q Okay.

4 A Yeah. So more than a boyfriend, but.
5 You know, just Harry.

6 Q Okay. So you've talked about the noises,
7 and I'm talking about the time period before you
8 went to see a therapist is kind of what I'm
9 interested in right now. The noises were bothering
10 you and --

11 A Yeah. It was tough being out. There
12 was -- a particular example is I didn't -- I
13 didn't -- I've driven once at night since this
14 happened myself, so other people would drive. And I
15 had friends willing to pick me up who knew what had
16 happened.

17 Q Uh-huh (affirmative).

18 A Because I'd have to tell them, you know,
19 be safe, et cetera, et cetera. We went to a haunted
20 house.

21 Q Okay.

22 A And my friend from high school, Dave, and
23 his wife, they organized the trip and their friend
24 Terry was driving.

25 Q Uh-huh (affirmative).

1 A And there were a couple of other girls,
2 and we were in Terry's new truck. It went fine
3 until the way back. Terry decided he wanted to show
4 off his truck and speed, and then Dave says we're
5 getting pulled over. I screamed. I screamed and
6 started to shake and Dave said, no, no, I mean we're
7 gonna get pulled over. That's not what you said, I
8 want to go home, I want to go home.

9 Q Okay.

10 A So because of these things I --

11 Q Okay. And --

12 A I don't feel safe driving, and I don't
13 trust my safety to others.

14 Q Was that before you went to see a
15 therapist that that happened?

16 A Yes.

17 Q Okay. Anything else? Were you having
18 panic attacks?

19 A Yes, all the time.

20 Q Okay. What was triggering the panic
21 attacks?

22 A Well, there's loud noises. My mom and I
23 go to the casino sometimes for food.

24 Q Okay.

25 A I'm not much of a gambler, but the

1 machines have red and blue lights.

2 Q Okay.

3 A There was a particular time when mom and I
4 were sitting at Dairy Queen, and somebody walked
5 behind me with keys on their belt and I immediately
6 thought handcuffs and I just started to shake --

7 Q Okay.

8 A -- at Dairy Queen. I've burst into tears
9 before in restaurants.

10 I got together with my half-sister and her
11 husband and another friend from the writing program,
12 and I almost started to cry because I just -- they
13 were all talking about how wonderful their lives
14 are.

15 Q Uh-huh (affirmative).

16 A And there's me and, like, do I belong
17 here.

18 Q Okay. The time -- the time between when
19 you left Georgia and before you went to see
20 Ms. Pavlico --

21 Do I have that name right?

22 A Yes.

23 Q -- okay -- on a daily basis what did you
24 do? Would you get up and eat breakfast in the
25 morning with your mom?

1 **A** I'd sit down and have coffee with my
2 **mother.**

3 **Q** Okay. And then for lunch, did you eat
4 lunch at the house?

5 **A** **Yeah. I rarely left the house.**

6 **Q** Okay.

7 **A** **Unless my mother insisted we go somewhere,**
8 **and I really hated when she did that.**

9 **Q** How often did you go out for food?

10 **A** **Once a month if.**

11 **Q** Okay.

12 **A** **If there was some errands or something**
13 **that needed to be done, my mom would take me, and**
14 **then she'd want to do 50 million stops.**

15 **Q** Okay. Did you write during that time?

16 **A** **I had to do my book edits.**

17 **Q** Okay.

18 **A** **But that was about all I could do --**

19 **Q** Okay.

20 **A** **-- the book edits, like, if there's some**
21 **soft-core BDSM in the books, and just writing that**
22 **was a trigger.**

23 **Q** And what is BDSM?

24 **A** **Bondage --**

25 **Q** Okay.

1 **A** -- and sex where he's got her tied.

2 **Q** Yeah.

3 **A** That kind of thing, and it just reminded
4 me of handcuffs and what happened to me afterwards
5 and.

6 **Q** Okay. Were those edits to add that in or
7 were they to remove it or to edit and change it?

8 **A** Edit and change. It was already there.

9 **Q** Okay. Okay. In order to make the edits
10 that your publisher or your editor needed you to do,
11 what did that require of you as far as a schedule?

12 **A** I'm not a very scheduled writer.

13 **Q** Okay.

14 **A** It's something I do. When I'm doing it, I
15 do it all the time.

16 **Q** Uh-huh (affirmative).

17 **A** Sometimes I spend -- you know, just
18 generally I -- if I'm writing, I'll focus on that
19 entirely until it's finished.

20 **Q** Okay.

21 **A** So sometimes I could be up until 3:00 in
22 the morning --

23 **Q** Okay.

24 **A** -- working on these edits or contemplating
25 them.

1 Q Did you work on the edits every day?

2 A No.

3 Q Okay. How many times per week did you
4 work on the edits?

5 A **It depended because I did several rounds
6 of edits.**

7 Q So it would be when she would send you
8 something?

9 A Yes.

10 Q Okay.

11 A **And then some -- I had good days and bad
12 days.**

13 Q Okay.

14 A **It also depended what I was editing.
15 After having written certain content, I would
16 have to -- having worked on certain content, I would
17 need a little bit of a break.**

18 Q Okay. And that was the sexual-bondage
19 portions of your book?

20 A Yes.

21 Q Okay. What was difficult about that?

22 A **Well, when her hands were tied, I was
23 thinking handcuffs. I was thinking of those women
24 touching me at the jail. And I know this is
25 Siegfried and Freya, which is perfectly consentual,**

1 and I keep reminding myself of that, but just the
2 way they forced me to do things there.

3 Q Uh-huh (affirmative).

4 A The way they forced me to do humiliating
5 things like squatting or turning around facing a
6 wall or standing up against the wall when the
7 wardens entered and just.

8 Q And all of those humiliating things
9 happened at the jail; right?

10 A Yes.

11 Q Okay.

12 A Except for what happened afterwards when I
13 got back.

14 Q Right, the -- right. With Mr. Beazer?

15 A Yes.

16 Q Okay. Was that experience --

17 Did that experience make editing your book
18 difficult as well?

19 A Yes.

20 Q Okay.

21 A Well, it --

22 Q Okay.

23 A Mind having -- though everything in that
24 book is consensual, it was really just her hands
25 being tied and stuff and I thought of --

1 Q Because she's a slave, right, in the book?

2 A Yeah. It's -- yeah.

3 Q And she's -- is -- she's his sexual slave
4 in the book; right?

5 A **But she's still -- she's completely
6 willing.**

7 Q She wants to --

8 A **Right.**

9 Q -- somehow, but she's his sexual slave;
10 right?

11 A **Oh, yeah. She could've totally gotten out
12 of it.**

13 Q Okay.

14 A **But she didn't and he knows that.**

15 Q Uh-huh (affirmative).

16 A **The consentuality is, you know, already
17 established I think because of our society and the
18 political-correct nature, gotta have everything
19 perfect, but that was so hard to write just thinking
20 about her hands tied behind her back at one point
21 like handcuffs back of police car.**

22 Q Are there portions of the book where she
23 has to kneel naked in front of Siegfried?

24 A **Yes.**

25 Q All right. Did that get added after your

1 arrest experience?

2 **A No.**

3 **Q**Okay. So that was in there before?

4 **A Yes.**

5 **Q**Okay.

6 **A The content is mostly -- you know, just**
7 **some deletions, some changes. It's mostly the way**
8 **it was when I sent it to them --**

9 **Q**Okay.

10 **A -- story-wise.**

11 **Q**How many -- how many fantasy erotica
12 stories do you think you've written total?

13 **A That's really hard to say. I mean --**

14 **Q**Is that primarily what you write?

15 **A It's more so not erotica. It's more so**
16 **romance.**

17 **Q**Okay.

18 **A Just when I made Siegfried and Freya, it's**
19 **just how they worked out as a couple.**

20 **Q**Okay.

21 **A But the --**

22 **Q**How did that happen?

23 **A Oh, my gosh. I'm not sure.**

24 **Q**Okay. It just came from within you;
25 right?

1 A I -- well, I create the characters and
2 they have their quirks and it kind of goes into,
3 like, why they're a certain way --

4 Q Okay.

5 A -- what are their background and -- oh.
6 But the thing is I -- this is, like, my only
7 erotica. The other ones that I'm looking at getting
8 published, the other two that follow up, are more
9 romance.

10 Q Okay.

11 A At least, that's the way the couples all
12 work.

13 Q Okay. Okay. So noises, being out was
14 bothersome, and editing your book given your
15 experiences --

16 A Yeah.

17 Q -- was bothersome?

18 A There's more than that, though.

19 Q Okay. And what else?

20 A I'm afraid to be involved, like, with
21 people or around people because I'm afraid that
22 those charges will be refiled and I'll get hauled
23 back to jail and I'll be ripped out of my life
24 again. And if I have nothing to lose, I -- it'll
25 hurt less. I just --

1 Q Okay.

2 A So I haven't wanted -- sometimes I've
3 gotten afraid of getting too close to these people.
4 I don't want people to get used to me being around
5 sometimes.

6 Q Have you gone on any dates since you were
7 arrested?

8 A Yeah.

9 Q Okay.

10 A Yeah, I have, just to --

11 Q How many do you think?

12 A Oh, gosh. I've gone on dates with maybe
13 about four or five different people, but it's never
14 really lasted.

15 Q Okay. What about going out with friends?
16 Have you -- have you done that since you came back
17 to Pennsylvania from Atlanta?

18 A Once in a while, but it's very hard.
19 They're all talking about how wonderful their lives
20 are, and I kind of just wish that I could be worried
21 about what shoes to wear tomorrow and, like, in my
22 mind I'm imagining getting pulled from my bed at
23 night --

24 Q Okay.

25 A -- by the police and taken back to jail,

1 and I don't want to go back to that place again.

2 Q What about going, like, to the hair salon
3 and getting your hair done? Are you able to do
4 that?

5 A I go to a place that's closer now --

6 Q Okay.

7 A -- because I was having problems and
8 canceled numerous appointments at -- I used to go to
9 Synergy Salon & Tan which I've gone to since before
10 I was married.

11 Q Uh-huh (affirmative).

12 A And that hair stylist did my hair for my
13 wedding. Katie and I had a very close relationship,
14 but it's 45 minutes away --

15 Q Okay.

16 A -- out on a dangerous road, highway,
17 interstate. I've almost gotten in car accidents on
18 that road a few times when I had panic attacks.

19 Q Okay.

20 A They -- so I just kind of made an
21 appointment -- I rescheduled a few because I was too
22 afraid to drive.

23 Q Okay.

24 A And then I finally just stopped going and
25 just didn't even cancel my last appointment, and I

1 just went to a place that's close by.

2 Q Okay. World of Warcraft. Have you been
3 able to continue playing World of Warcraft?

4 A (Witness nods head affirmatively).

5 Q Okay.

6 A Yeah.

7 Q Do you find that to help you or does it
8 make you anx --

9 A People --

10 Q -- anx --

11 A People appreciate my writing.

12 Q Uh-huh (affirmative).

13 A Devon no longer plays, so I don't see him
14 there anymore. But it's nice to at least be
15 complimented and appreciated for something.

16 Q Uh-huh (affirmative).

17 A And my writing's one thing, if I can do
18 it, that makes me happy. And sometimes it's easier
19 doing cooperative writing with other people because
20 it's not all up to me and it kind of forces me to
21 think.

22 Q Okay. Okay. In the World of Warcraft, in
23 the game itself, isn't there some bondage type stuff
24 going on and some different people killing other
25 people?

1 **A People killing, you know, other people.**

2 **Q Do you find that to be disturbing?**

3 **A The killing?**

4 **Q Uh-huh (affirmative).**

5 **A No. Well, you know what, in PVP I get**

6 **upset when somebody kills another player and they**

7 **refer to it as raping them.**

8 **Q Uh-huh (affirmative).**

9 **A That really upsets me.**

10 **Q Uh-huh (affirmative).**

11 **A But there's an ignore feature --**

12 **Q Okay.**

13 **A -- where I can right-click the name and**

14 **ignore them and I won't see anything else they say.**

15 **Q Okay.**

16 **A And I will frequently use the report**

17 **feature to report people who do that.**

18 **Q Okay.**

19 **A So that kind of helps.**

20 **And then the other drawback is things**

21 **upset me. I mean, yes, it does remind me of Devon,**

22 **but then there are also people there who do**

23 **appreciate my writing and.**

24 **Q You were still doing edits when you came**

25 **back to Pennsylvania on your book; right?**

1 **A Yeah.**

2 **Q**How many times do you think you had to
3 read your book when you came back from -- back to
4 Pennsylvania?

5 **A Maybe five times.**

6 **Q**Okay.

7 **A That's a ballpark.**

8 **Q**Okay. Were you reading it straight
9 through or were you reading portions of it?

10 **A I'd start at the beginning and I'd go**
11 **through, especially -- well, it got less and less**
12 **each time.**

13 **Q**Okay.

14 **A The first time I'd read it all the way**
15 **through because there was a lot of red, and each**
16 **time less and less and less.**

17 **Q**Was that -- the first time you had to read
18 it all the way through and there was a lot of red,
19 when was that? Was that soon after you got back to
20 Pennsylvania?

21 **A That might have been maybe December or**
22 **January --**

23 **Q**Okay.

24 **A -- by the time they got the edits to me.**
25 **They needed me to do all that stuff about book**

1 **covers and.**

2 Q How long did it take you to get through
3 the book when you got back to Pennsylvania?

4 A Once I started the edits the first time,
5 maybe a month or two.

6 Q Okay. Was that you reading it every day?

7 A Yeah.

8 Q Okay.

9 A Sometimes I'd put it aside, though.
10 Generally every day, unless I needed to take time
11 off --

12 Q Okay.

13 A -- and step away from the piece.

14 Q Okay. After you met with Jill Cosgrove
15 the first time, did she recommend a plan for you as
16 far as your treatments?

17 A Jill recommended the Prozac and prazosin.

18 Q Okay.

19 A But Karlene's been the one advising me on
20 other things.

21 Q Is she in Dr. Berger's office?

22 A Yes.

23 Q Okay.

24 A Both there.

25 Q Okay.

1 **A** So it's kind of -- they work
2 cooperatively.

3 **Q** Okay.

4 **A** Karlene advised me about little things,
5 like, if I have to drive and I start to panic, maybe
6 count the bumps on the steering wheel.

7 **Q** Okay.

8 **A** The things like that, just breathing
9 exercises. Sometimes I forget to breathe.

10 **Q** Okay.

11 **A** That sounds so dumb.

12 **Q** No. Was August 14th of 2014 the first --
13 your first appointment in Dr. Berger's office?

14 **A** That sounds about right.

15 **Q** Okay. If you'll flip --

16 Can you flip to the end of your packet
17 there?

18 **A** Sure.

19 **Q** And I think it may have the first --

20 **A** Okay.

21 **Q** It should say Page 23 of 26 at the top.

22 **A** That's 25, 24 and 23, Jill Cosgrove,
23 8/14/14.

24 **Q** Okay. Who first mentioned PTSD to you?

25 **A** The first person to mention it was

1 **actually -- I believe it was Deb Pavlico.**

2 Q Okay.

3 A **But she doesn't have the ability to**
4 **diagnose.**

5 Q Okay.

6 A **And I -- so when I stopped going to her --**
7 **I went a couple of months, and I'm like I'm gonna**
8 **try and do something else; and she recommended going**
9 **to see a psychiatrist or a psychologist.**

10 Q Okay. So did you stop going to see Deb
11 Pavlico and then waited a couple of months and then
12 went to see Dr. Berger?

13 A **Yeah. I went through periods where I just**
14 **completely just did not want to drive.**

15 Q Okay. So that would've been from June of
16 2014 to August of 2014?

17 A **Yeah.**

18 Q Okay.

19 A **And we live in an area where it's not**
20 **feasible to walk. My mother works and Harry has eye**
21 **problems, so it's hard for me to find transportation**
22 **back --**

23 Q What were you doing on a daily basis
24 between June 2014th and August 2014?

25 A **Waking up sitting with my mom in the**

1 mornings before she went to work.

2 Q Okay.

3 A Trying to get the rest of those mugshots
4 down on the Internet, crying about those. I cried a
5 lot.

6 Q Have those been taken down?

7 A All except one that doesn't actually have
8 my picture.

9 Q Okay. Is it --

10 What kind of site is that on?

11 A **Mugshots.com.**

12 Q Okay. Do you know whether you can pay a
13 fee to have that information taken down?

14 A **Yeah. You can pay, like, \$500 I believe
15 it is.**

16 Q You think it's \$500?

17 A **Yeah. The other ones I believe were,
18 like, anywhere from a hundred to 300 per site.**

19 Q Okay. Have you thought about paying to
20 have that taken down?

21 A **I have.**

22 Q Okay.

23 A **I have.**

24 Q Have you looked into it at all?

25 A **We've paid a few already --**

1 Q Okay.

2 A -- the ones with my picture up there.

3 Q Okay.

4 A And definitely the ones -- the ones that
5 had my old address.

6 Q Okay. Are you familiar with whether or
7 not Dr. Berger is an expert witness who testifies in
8 court relatively frequently?

9 A I'm not sure. I've talked to Jill about
10 it a little bit and Karlene. And they said, you
11 know, he's written legal things before is really all
12 I know.

13 Q He's written legal things before?

14 A Well, just notes and stuff, like, when he
15 sent --

16 Q Okay.

17 A -- a note.

18 Q So, like, the note when --

19 A Yeah, trying --

20 Q -- you were requesting to stay in
21 Pennsylvania for your deposition?

22 A Yeah.

23 Q Okay. What kind of nightmares have you
24 been having?

25 A That I'm incarcerated again.

1 Q Okay.

2 A That I'm back in a jail and I don't know
3 when I'll be leaving.

4 Q Okay.

5 A And I have no phone, nobody around me that
6 I trust, no blankets, no comforts at all --

7 Q Okay.

8 A -- just nothing but fear.

9 Q Do you know whether or not Bill contacted
10 your mother when you texted him that you were -- you
11 were -- thought you were being arrested?

12 A I'm not sure. I'm not sure.

13 Q Has your mom told you if that happened?

14 A She probably has, and I don't remember.

15 Q Okay.

16 A I've talked to Bill several times since it
17 happened. Well, I talked to Bill about the
18 incident.

19 Q What do you think Bill would've said about
20 you having the prescription medication with you if
21 Officer Gilbert had been able to get in touch with
22 him?

23 A He would've said, oh, gees, she -- she
24 doesn't clean anything out, she's disorganized.
25 It's one of those things we fought about a lot, not

1 fought about but it was one of the points of
2 contention was my organizational skills and
3 forgetfulness and.

4 Q And he's very detail-oriented as an
5 engineer; right?

6 A Very much so.

7 Q And did he not know where his medication
8 was?

9 A Well, that he knew that I -- but I think
10 he forgot about it, too, in the whole business with
11 divorce.

12 Q Okay.

13 A And then I left abruptly. And it's one of
14 those things, you know, like husband's socks and
15 stuff. I ended up with a bunch of those and other
16 items I was planning on returning. I got really
17 disorganized for a while.

18 Q Do you know anyone else who has PTSD?

19 A Just -- I'm trying to think do I know
20 anybody. I'm trying to think of, like, military
21 friends or anything. No.

22 Q What about Erica? Has she told you she
23 has PS -- PTSD?

24 A Oh. She thinks she does from --

25 Q From what?

1 **A** -- teaching at an inner-city school.

2 **Q** Okay. How did that give her PTSD?

3 **A** It was a dangerous school where you didn't
4 know if kids were gonna show up with weapons, et
5 cetera, I believe that's why, and possibly some home
6 influences, but I don't think she was actually
7 diagnosed.

8 **Q** What kind of home influences was she
9 dealing with?

10 **A** She had a stepfather she didn't like,
11 and I would think --

12 **Q** Do you think she has PTSD?

13 **A** Honestly? No.

14 **Q** Okay.

15 **A** No, unless she's really good at hiding it.

16 **Q** What do you think she thinks about your
17 PTSD diagnosis? You think she thinks you have PTSD?

18 **A** I think so. I mean, she's admitted we
19 made plans to go out and I always cancel and say
20 come up to the house instead, I don't -- I don't
21 want to drive.

22 **Q** During 2014 have you gone out with Erica?

23 **A** Gone out? No.

24 **Q** Out anywhere with her?

25 **A** No. She's come to the house.

1 Q Okay.

2 A I don't recall going anywhere with her,
3 but she's wanted me to. And I say, yeah, I'll go
4 and then can you just come to the house every time.

5 Q Have you gone out with her for her
6 birthday?

7 A For her birthday? No, not that I recall.

8 Q Okay.

9 A But she keeps -- she's always tried to
10 make a lot of plans, like, trips and stuff. And I
11 said yeah and figure I can always cancel at the last
12 minute.

13 Q Like what? Where did she want to go?

14 A She want -- there was some concert I think
15 that was in Vegas that she wanted to go to. And I
16 was kind of kidding with her, oh, yeah, that sounds
17 like it'd be a lot of fun, blah-blah-blah, but I
18 wouldn't go, even though I don't -- really didn't
19 go.

20 The only one who's been able to get me to
21 do any kind of actual trip is my half-sister. She
22 forced me into it.

23 Q Where did you go?

24 A We went to Atlantic City for the weekend.

25 Q When was that?

1 **A** Super Bowl weekend last year.

2 **Q** Okay.

3 **A** She gave me --

4 **Q** Which sister is this?

5 **A** Joy.

6 **Q** Joy Bomba?

7 **A** Yeah. She gave me tickets to -- she made

8 **a reservation for us in Atlantic City to go for one**

9 **night.**

10 **Q** Did you attend the Super Bowl?

11 **A** Oh, no. We just watched it at -- we don't

12 **really like sports. We're kind of making fun of the**

13 **people that do.**

14 **Q** Okay. So where did you watch it?

15 **A** Downstairs in Caesars Palace.

16 **Q** Okay. Okay. Did you have fun on that

17 **weekend?**

18 **A** With her, yeah. I had a few drinks in

19 **order to feel comfortable staying out, but we --**

20 **Q** Okay.

21 **A** It was a little rough. I know she got

22 **irritated with me at some points for being**

23 **nervous --**

24 **Q** Okay.

25 **A** -- because she went jogging in the

1 closed-off upstairs of the hotel where you're not
2 really supposed to go. I'm like, Joy, please don't
3 get in trouble, don't do anything that might be
4 wrong. And she's like would you stop.

5 Q And what did y'all do on that weekend?

6 You went -- you watched the Super Bowl. What else?

7 A Well, we walked --

8 Q Did y'all gamble?

9 A We used the free tickets.

10 Q Okay.

11 A We had the free vouchers that they give
12 you when you get a bus. We played the -- they had a
13 Princess Bride slot machine, and we really enjoyed
14 that because they showed movie clips.

15 Q Okay.

16 A And we went for seafood and devised a plan
17 to be silly at the Super Bowl and make it
18 interesting because we hate sports.

19 Q Okay.

20 A So at the Super Bowl we'd jump up and be
21 like run faster, run faster, sports harder. And she
22 was rooting for the Broncos instead of -- or no.
23 I'm sorry. She was rooting for the Bulls instead of
24 the Broncos, and I was rooting for the Penguins
25 instead of the Seahawks.

1 Q Okay.

2 A **General silliness.**

3 Q Okay.

4 A **That was -- she dragged me. She forced me**
5 **into going out.**

6 Q Are there security guards in Caesars
7 Palace?

8 A **Yeah, yeah.**

9 Q Are there police officers generally
10 walking around at Atlantic City?

11 A **Yes.**

12 Q I see in one of these reports, it's Page
13 14 of 26, kind of halfway down it says: Patient's
14 mother is constantly stressed and shares the stress
15 and puts a lot of stress on the patient.

16 What is -- what is that about?

17 A **My mother's always stressed about her job.**

18 Q Uh-huh (affirmative). Okay.

19 A **And this --**

20 Q What does she do for a living?

21 A **She is in charge of the financial stuff**
22 **for a water filtration company --**

23 Q Okay.

24 A **-- and a company that replaces water**
25 **meters.**

1 Q Okay.

2 A The company does two different things, but
3 she's in charge of the -- all the finances there.

4 Q Okay.

5 A And from what I understand, people lose
6 their jobs and it's always on her.

7 Q Okay.

8 A But she's very detail-oriented and
9 meticulous, so.

10 Q And how does that stress you out?

11 A How can I say this? My mother, in my mind
12 she equates success and contributing to society to
13 be stressed. If you're stressed and feeling
14 overworked or deal with a lot of crap, then you're
15 doing a lot of work.

16 Q Okay.

17 A She's -- the phone is always ringing,
18 always ringing, and it startles me and she talks on
19 the phone very loudly. And just, like, the
20 stressed-out voices in the house, I think
21 something's wrong or sometimes I run downstairs, is
22 everything okay, is everything okay. And she's like
23 would you stop, would you stop, yes, everything's
24 fine, everything's fine. I -- yeah.

25 Q Okay.

1 **A** It's the general noise or sometimes
2 initially the --

3 **Q** How long has she had that position with
4 the water filtration company?

5 **A** Oh, gosh. Shortly after my parents got
6 divorced when I was 13, I believe.

7 **Q** Okay.

8 **A** Or maybe it was a couple of years later.
9 I'm not fully -- somewhere in that timeframe, since
10 when I was a teenager.

11 **Q** Okay. Did I see something in here that
12 your grandparents helped to raise you?

13 **A** They did.

14 **Q** Okay. And why was that?

15 **A** My mother took care of the financial stuff
16 for Cee Kay Auto when she and my father were still
17 together.

18 **Q** Okay.

19 **A** But she decided to not stay after they
20 split.

21 **Q** Okay.

22 **A** They're still great friends, but she just
23 didn't want to work there.

24 **Q** Uh-huh (affirmative).

25 **A** And they worked long hours running the

1 company. There was always something coming up to
2 demand their attention or the end of the month, the
3 end of the year.

4 Q Uh-huh (affirmative).

5 A So they would be at work, and I got
6 attached to my grandparents.

7 Q Uh-huh (affirmative).

8 A And when I was a little kid we -- we were
9 all living in one house for a while --

10 Q Okay.

11 A -- my mom and dad and my grandparents, and
12 my mom and dad had this house -- had a house built.
13 So when it was ready, they brought me up there, and
14 I wanted to go back home with my grandparents.

15 Q Uh-huh (affirmative).

16 A The new house was big and scary, and I
17 missed -- I missed my grandparents.

18 Q Uh-huh (affirmative). So you went to live
19 with your grandparents?

20 A Yeah, until the house burned down --

21 Q Oh, goodness.

22 A -- when I was in kindergarten and --

23 Q Man.

24 A Yeah. Then we moved in with my parents,
25 but my grandparents were still -- you know, it was

1 already the custom that they'd help me with school
2 work.

3 Q Uh-huh (affirmative).

4 A They would take me to extracurriculars.
5 If I wanted to do anything, they would take me
6 places.

7 Q Okay.

8 A So they were pretty much parenting.

9 (Thereupon, marked for identification
10 purposes, Defendant's Exhibit 5.)

11 BY MS. COWAN:

12 Q Okay. Okay. Your attorney provided me
13 with a conversation between you and Erica --

14 A Yeah.

15 Q -- about -- essentially about this case.

16 Is that from Facebook or what is that
17 from?

18 A Yeah, Facebook.

19 Q Okay. I think we're on Exhibit 5.

20 A I went back through old phone mess -- or
21 old Facebook messages and found whatever was
22 available.

23 Q Okay. I'm gonna mark the Facebook
24 conversation as Exhibit 5.

25 A Okay. So this is the Wilkes thing.

1 Q What other -- you've got the -- you've got
2 a Facebook account.

3 A Uh-huh (**affirmative**).

4 Q You've got the -- I saw the World of
5 Warcraft blog that you have.

6 A It's from Maria.

7 Q What's on that World of Warcraft blog?

8 A Oh. Just, like, screen shots of in games
9 and some really short stuff that I've been able to
10 write.

11 Q Is it writing about World of Warcraft?

12 A Just the characters I've created.

13 Q Okay.

14 A And I have a couple of friends -- well, a
15 few friends there who liked my writing style and
16 went and bought my books.

17 Q Okay.

18 A So I put stuff out once in a while. I
19 don't really post much on social media, period.

20 Q Okay. Any other --

21 Do you have anything that's an account
22 that's related to Aurora Styles?

23 A I have a Tumblr account for Aurora
24 Styles --

25 Q Okay.

1 **A -- and a Facebook page for Aurora Styles.**

2 **Q Okay. What's on those -- on those**
3 **accounts?**

4 **A Just pictures of the book.**

5 **Q Uh-huh (affirmative).**

6 **A Some quotes from the book.**

7 **Q Okay.**

8 **A Generally what makes you buy a book from**
9 **the bookstore, just little questions I pose.**

10 **Q Uh-huh (affirmative).**

11 **A But just generally all things**
12 **book-related.**

13 **Q Okay.**

14 **A I can't remember if I signed up for**
15 **Twitter or not. I've never figured out how to**
16 **properly use Twitter.**

17 **Q Okay. What were Bill Schroeder's**
18 **allergies when y'all were married?**

19 **A I don't know. He'd get a snuffy nose**
20 **sometimes, if I recall correctly.**

21 **Q Okay. Did he regularly take allergy**
22 **medicine?**

23 **A You know what, I honestly don't know.**

24 **Q Okay.**

25 **A I honestly don't. I think every once in a**

1 while, I think he'd get a snuffy nose. But if he
2 was not feeling well, you couldn't tell.

3 Q Okay.

4 A You know, if I got sick, I had the
5 sniffles, I'd cough. He'd get sick, and he was
6 normal.

7 Q Was he taking allergy medicine? Do you
8 think maybe that was it?

9 A Maybe -- I don't know. Like, I don't
10 know. Like, I know there was Zyrtec in the house.
11 And I --

12 Q All right.

13 A I didn't really spend much time --

14 Q And I -- and I asked -- I think you said
15 that one of his prescriptions may have been an
16 allergy medication.

17 A It might have been.

18 Q And did you ever take that in your travel
19 purse on a trip with you?

20 A No. I don't think so. It's not something
21 I don't think -- I really don't think he took it
22 regularly.

23 Q Okay.

24 A I really don't think I had everything
25 regular that he took.

1 Q Did he take the Clonazepam regularly?

2 A **Just travel.**

3 Q Only on travel?

4 A **Yeah.**

5 Q Okay.

6 A **I think most medications kind of got**
7 **forgotten about and just got put into the medicine**
8 **cabinet.**

9 Q Okay. At DSM Dyneema --

10 Am I saying that right?

11 A **Yeah.**

12 Q -- what are his hours like on a regular
13 basis?

14 A **They were fairly irregular. He'd go in in**
15 **the mornings, but then I never knew when he was**
16 **gonna be home.**

17 Q How late did he work?

18 A **It depended. Sometimes he'd be home 5:00**
19 **or 6:00, some days 4:00, then some days, like, 9:00**
20 **or 10:00.**

21 Q Okay.

22 A **It really varied depending on what went**
23 **wrong and who needed him or if there was maybe a**
24 **meeting after work.**

25 Q Okay.

1 **A Sometimes they'd go and take new people**
2 **out to eat or stuff would break at work.**

3 **Q Okay. Can you name a time during 2014**
4 **when you went out with friends for a party other**
5 **than the Super Bowl trip to Atlantic City?**

6 **A Two times.**

7 **Q Okay. Tell me about those.**

8 **A One was in May for my friend Rebecca's**
9 **birthday.**

10 **Q Okay. What did y'all do for that?**

11 **A Well, she picked me up and we went -- we**
12 **met her friends from work at a brewing company.**

13 **Q Okay.**

14 **A And then afterwards everybody wanted to go**
15 **to Thai Thai Thai-food place.**

16 **Q Okay.**

17 **A And I had enough. My mom came to pick me**
18 **up.**

19 **Q Okay.**

20 **A And the other time was just for Halloween.**

21 **Q Okay.**

22 **A We did a birthday/book/Halloween party,**
23 **and it was at the casino, and I was maybe out for**
24 **three or four hours.**

25 **Q Okay. And what is the casino that you're**

1 referring to?

2 **A It's a casino by the house. It has lots**
3 **of restaurants and little bars.**

4 **Q Okay.**

5 **A There's lots of stuff there besides the**
6 **gambling.**

7 **Q Does it have a name?**

8 **A Mohegan Sun.**

9 **Q Oh, okay. And it's near your parents'**
10 **house?**

11 **A Yeah.**

12 **Q Your mom's house?**

13 **A It's about a five-minute drive, five,**
14 **ten-minute drive, so. I usually get a ride.**

15 **Q Okay.**

16 **A It's nice because my mom can drop me off.**
17 **And I go there to get my hair done, too, but I do**
18 **that in, like, non-heavy traffic hours.**

19 **Q Okay. How often do you go to the Mohegan**
20 **Sun casino?**

21 **A I think I've been there maybe three or**
22 **four times in the past year.**

23 **Q Okay. To do what? You said hair.**

24 **A Oh, no. Okay. Writing and hair**
25 **appointments, that's --**

1 Q Okay.

2 A Yeah.

3 Q And how many is that?

4 A I've been going there for about three
5 months now for hairdos. That's one time a month.
6 But then I was there in October. I was there -- I
7 was there when my dad -- my dad and sister wanted to
8 go. I kind of got dragged. I didn't really want to
9 go.

10 Q Okay.

11 A It was Joy again dragging me out.

12 Q Okay.

13 A And then another day Joy and I went and
14 met our niece there --

15 Q Okay.

16 A -- who just turned 21.

17 Q And what did y'all do then?

18 A We wandered around the casino to the wine
19 and cheese tasting. Joy did a little bit of
20 gambling --

21 Q Okay.

22 A -- walked in shops a little bit, and then
23 we went for steaks.

24 Q Okay. At Mohegan Sun you ate steaks?

25 A Yeah. There's a Ruth's Chris.

1 Q Okay. And you get your hair done once a
2 month?

3 A **Yeah, every four weeks.**

4 Q Does it involve color?

5 A **Yeah.**

6 Q Do you get foils?

7 A **No, just bleach and then toner.**

8 Q Okay. How long does that appointment
9 usually last?

10 A **About two hours.**

11 Q Okay. What about nails? Do you get your
12 nails done?

13 A **No. I did, like, one time before the book
14 party.**

15 Q Okay.

16 A **But generally my nails are crap from
17 typing.**

18 Q Okay. What about, did you -- have you
19 ever had a meet-in-person with your editor or your
20 publisher --

21 A **No.**

22 Q -- or have you done everything over the
23 phone?

24 A **It's been all over the phone and e-mail.**

25 Q Okay. Your Interrogatories list Devon

1 Beazer as someone upon whose testimony you may rely
2 to prove your claims.

3 Do you still intend to do that? Do you
4 intend to use him to testify on your behalf in
5 court?

6 **A I'm not sure if it'd be a good idea. I**
7 **really want nothing to do with him.**

8 **Q Okay.**

9 **A I've blocked him from all social media, et**
10 **cetera.**

11 **Q Okay. And what about Erica?**

12 **A Yes, Erica.**

13 **Q Okay. Patricia Butts, is that your**
14 **mother?**

15 **A Yes.**

16 **Q And what information would she be able to**
17 **provide that would -- that would support your case?**

18 **A Well, she's been having to cart me around**
19 **and deal with all the panic attacks and just live**
20 **with me on a daily basis where I freak out when the**
21 **door bell rings or the dog barks.**

22 **Q And then Robert Butts, is that your dad?**

23 **A Yes. That's my dad.**

24 **Q How often do you see your dad?**

25 **A Once a month, but we talk a few times a**

1 week.

2 Q Okay. And what would he be able to
3 provide?

4 A My dad has listened to me cry on the phone
5 numerous times, and I have been back and he's seen
6 my lack of involvement with a lot of things despite
7 his trying to get me involved more. He's been kind
8 of pushing me to promote my book and maybe get
9 involved in different causes again.

10 Q Okay. Have you taken any steps toward
11 doing that?

12 A My book is just mostly social media. I
13 don't really -- I'm afraid to leave the house and
14 getting involved with stuff. I'm really afraid to
15 get involved with people in case they find out about
16 this arrest and think, like, I'm a drug lord or some
17 horrible --

18 Q Uh-huh (affirmative).

19 A -- or, like, some horrible untrustworthy
20 junky.

21 Q Uh-huh (affirmative).

22 A Like, I don't like meeting new people.

23 Q The dates you've been on --

24 How many dates have you been on since your
25 arrest, just a rough estimate?

1 **A Ten or so maybe.**

2 **Q Okay.**

3 **A But, like, some with, like, the same**
4 **people.**

5 **Q Okay. So ten or so outings with someone**
6 **or ten different people?**

7 **A Ten or so outings with someone.**

8 **Q Okay.**

9 **A A couple of different people. Just a lot**
10 **of them were just, like, little lunch dates that**
11 **never went any further.**

12 **Q Okay. How did you -- how did you go about**
13 **meeting the people that you went on dates on -- went**
14 **with the date -- went on dates with?**

15 **A People I knew in the past --**

16 **Q Okay.**

17 **A -- from politics or just when I used to be**
18 **in car club.**

19 **Q Okay.**

20 **A They just look me up, oh, hey, let's get**
21 **together for coffee or something, okay.**

22 **Q Who did you go out on dates with?**

23 **A Oh, gosh. Well, there was a personal-**
24 **injury attorney.**

25 **Q What was his name?**

1 A P.J. Biscontini. There's a lot of P.J.
2 B's.

3 Q Oh, my goodness.

4 A Yes. He was friends with P.J. Best to add
5 to the confusion. That's how I knew P.J.
6 Biscontini.

7 Q How do you spell Biscontini?

8 A B-I-S-C-O-N-T-I-N-I (spelling).

9 Q Okay.

10 A P.J. is --

11 Q How many dates did you go on with P.J.
12 Biscontini?

13 A One.

14 Q Oh. What about somebody else that you
15 went on a date with?

16 A Daniel Smeriglio.

17 Q Okay.

18 A And I knew him from working with Voice of
19 The People USA and Tea Party groups.

20 Q Okay. What's the U.S. Pirate Party?

21 A Oh. It's a third party, and it was kind
22 of my biting my thumb at the GOP. I joined them
23 after --

24 Q Okay.

25 A -- after some -- after the Republican

1 Party decided to do some unwise endorsements and not
2 explain their decision.

3 Q Okay.

4 A I thought the endorsements were unwise, at
5 least, just some general practices and
6 discriminating against certain candidates. I went
7 over to a third party and I heard these letters.

8 Q Okay.

9 A That didn't last very long and I don't --

10 Q Okay. We've got P.J. Biscontini, Daniel
11 Smeriglio.

12 Anybody else you went on a date with?

13 A Oh, my gosh. I'm trying to think, I've
14 had so many dates. Oh. Oh, gosh. Sorry.

15 Q That's okay.

16 A I'm just, like, trying to think here. Oh.
17 There was this Mike guy who I went for
18 doughnuts with, but afterwards he decided to tell me
19 he was married, and I said no.

20 Q How'd you meet Mike?

21 A I knew Mike from car-club days.

22 Q What is car club?

23 A We used to drive, you know, like, Fast &
24 Furious kind of cars, like, back when I was, like,
25 in my late teens.

1 Q What did you drive?

2 A A pink Honda Civic.

3 Q Okay. Do you still have it?

4 A No. That's long gone. It was cute,
5 though.

6 Q Anybody else you went on a date with?

7 A Oh, gosh. I'm trying to think here.

8 This Jeremy guy. I don't remember his
9 last name. That didn't work out well.

10 I'm sorry. Like, I have friends try and,
11 like, get me to go on these, like, lunch dates every
12 so often.

13 Q Uh-huh (affirmative).

14 A And I go through a dry spell where, like,
15 I don't leave the house and then, like, I need to
16 get out again, like, here, go hang out with
17 so-and-so.

18 Oh, Terry Acasio, which is another one,
19 the guy who drove the truck that one night and
20 decided to speed.

21 Q You went on a date with him?

22 A He came to the house to watch movies.

23 Q Okay. What'd y'all watch?

24 A What did we watch? It was some awful
25 horror movie, but he kept interrupting to talk

1 about, like, what his aunt made or grandmother made
2 for dinner or something and describing it in great
3 detail. That's kind of what I remember of that
4 movie.

5 Q Okay.

6 A I'm sorry if I'm blanking a little bit
7 here.

8 Q No. That's okay. Who is Rebecca?

9 A Rebecca is the first friend I made in
10 public school.

11 Q Okay. Are you still friends with Rebecca?

12 A Uh-huh (affirmative).

13 Q When did you see Rebecca last?

14 A Rebecca came over to visit me last Friday.

15 Q Okay.

16 A I've known her since I was 14.

17 Q She lives in Pennsylvania?

18 A Yeah. She works for a local newspaper.

19 Q Okay. Is she the person that interviewed
20 you for the article?

21 A No, but she got her friend to interview me
22 for it.

23 Q Okay. Have you gone anywhere with Erica
24 recently?

25 A Erica, no. Rebecca, yes.

DEPOSITION OF RENEE SCHROEDER BUTTS 12/18/2014
RENEE SCHROEDER vs. CALEB GILBERT

1 Q I mean Rebecca.

2 A Yes.

3 Q Rebecca's what I meant. Sorry.

4 A **Rebecca, yeah. She came to my book party.**

5 Q Okay.

6 A **And maybe once every couple of months**

7 **we'll go to TGI Friday's and get cotton-candy**

8 **cosmos.**

9 Q Okay.

10 A **But that's really kind of it.**

11 Q So you do that on a pretty-regular basis?

12 A **No, just once every couple of months.**

13 Q Okay.

14 A **I cancel plans more than I keep them.**

15 Q Yeah. Who's Chad?

16 A **Chad is my friend from creative-writing**

17 **class.**

18 Q Okay.

19 A **Chad Mullen.**

20 Q When did you see Chad last?

21 A **Maybe over the Summer. It's been a little**

22 **while. But he was -- he and I talked more regularly**

23 **after this whole incident.**

24 Q In what context did you see Chad?

25 A **Oh. I think we went on something that**

1 might be considered a date or might not because
2 we're kind of, you know, the whole
3 friends-but-flirty type deal.

4 Q Okay. So what did y'all do?

5 A We picked up pizza for my mother once --

6 Q Okay.

7 A -- and just brought it back to the house,
8 and once -- once -- he took me out for my birthday
9 last year --

10 Q Okay.

11 A -- and then made me pay.

12 Q Where did y'all go?

13 A A local -- a local bar that's -- it has,
14 like, a list of craft beers and really-good, like, a
15 wide variety of food.

16 Q Okay. What's it called?

17 A Arena Bar & Grill.

18 Q Okay.

19 A And where else did Chad and I go? Oh. We
20 went -- he was out with me and Joy and Joe one
21 night, with Joy and her husband, because me, Chad
22 and Joe were kind of a clique in the
23 creative-writing program.

24 Q Okay. When you went out with Joy and her
25 husband, was that when you went to Mohegan Sun or --

1 A Yeah.

2 Q Okay. Okay.

3 A Yeah, Joy and her husband. Like I said,
4 me and Joe and Chad were all good friends.

5 Q Okay. That's right. She's married to the
6 friend from --

7 A Yeah.

8 Q Gotcha. Who's Katie?

9 A Katie is a friend from -- that I also knew
10 in high school. I met her in modeling. She and I
11 don't keep in touch quite as much anymore.

12 Q Okay.

13 A Me, Rebecca and Katie used to be a little
14 bit of a trio --

15 Q Okay.

16 A -- I guess you could say because it was us
17 a lot in school. Katie went to a different school,
18 but as far as after school she was close.

19 Q Okay.

20 A So we'd pick her up and go hang out.

21 But Katie -- Katie lives about an hour or
22 more away.

23 Q Okay.

24 A And she's got one kid, another one on the
25 way, and she's married, and I don't really want to

1 make the trip up.

2 Q Okay. When's the last time you saw Katie?

3 A I haven't seen her since I've been back at
4 all.

5 Q Okay. And you said you know her from
6 modeling.

7 What kind of modeling are we talking
8 about?

9 A When we were both at Barbizon for modeling
10 school.

11 Q Oh, okay. When were you there?

12 A Modeling school?

13 Q Uh-huh (affirmative).

14 A I went there -- I believe I was about 13.
15 I was in ninth grade.

16 Q Okay.

17 A And then I was picked to join the
18 management -- the model management agency they
19 started where they took some of the more -- I guess
20 who they thought were more promising, they took some
21 of us to New York.

22 Q Okay. Okay. And when was that? Was that
23 the next year or?

24 A That would've been in 1999 --

25 Q Okay.

1 **A** -- because I was 16.

2 **Q** Okay.

3 **A** That was April 1999. I went to the
4 **Modeling Association of America International**
5 **competition.**

6 **Q** Okay. And when -- have --

7 Are you still doing that kind of stuff or?

8 **A** **No.**

9 **Q** Okay. When did you stop doing that?

10 **A** **Not too long after the MAAI.**

11 **Q** Okay.

12 **A** I had one agency interested. I didn't
13 want to change my last name, and I didn't want to
14 die my hair honey brown, and I honestly just -- it
15 wasn't exactly intellectually stimulating to sit
16 there and smile.

17 **Q** Okay. And I think you thanked Shaun in
18 your book. Is that Shawn Brown?

19 **A** **S-H-A-U-N (spelling)?**

20 **Q** Uh-huh (affirmative).

21 **A** **To -- oh. Where is that?**

22 **Q** Who is Shaun Brown? I'm looking at this,
23 your Dedication page from your book.

24 **A** Oh, gosh. Shaun, Shaun Lucy. I hardly
25 see him anymore, but he was a friend in high school.

1 I knew him in high school.

2 Q Okay.

3 A And we used to date but then became good
4 friends. He's, like, the older brother --

5 Q Okay.

6 A -- I never -- I never had and kind of
7 didn't want, but he's a nice person.

8 MS. COWAN: Okay. Let me mark this as
9 Exhibit 6.

10 (Thereupon, marked for identification
11 purposes, Defendant's Exhibit 6.)

12 BY MS. COWAN:

13 Q Why did you thank Shaun in your book?

14 A Because he has done some silly
15 off-the-wall things, and somehow, like, that
16 inspires me.

17 Q Okay.

18 A Because I like to create silly characters.
19 I mean, he called somebody a jelly-eating sandwich
20 once.

21 Q Okay.

22 A That's weird. Who does that.

23 Q Yeah. That doesn't make any sense. Okay.

24 A Or he's -- you know, we had an argument
25 once that there was no February 30th.

1 Q Okay.

2 A You know, he's made me laugh a lot,
3 though, but he's so --

4 Q When's the last time you saw him?

5 A Shaun?

6 Q Uh-huh (affirmative).

7 A Gosh. He stopped by the house, but he
8 really comes over more to visit with my mom, and I
9 kind of sit in my room.

10 Q Have you seen him recently?

11 A Maybe over the Summer.

12 Q Okay.

13 A Because he was kind of bothering me a
14 little bit now since I was back. He's -- he has
15 wanted to get back together with me. We dated when
16 I was 16.

17 Q Okay.

18 A And it's, like, been weird since I have
19 been divorced and separated and just --

20 Q Yeah.

21 A -- I just have no interest.

22 Q Have you gone anywhere with Shaun since
23 you've come back to Pennsylvania?

24 A His brother-in-law was Loxley's vet.

25 Q Okay.

1 **A So he would take me to take Loxley to the**
2 **vet --**
3 **Q Okay.**
4 **A -- sometimes.**
5 **Q Okay.**
6 **A And --**
7 **Q Did you always take Loxley to the vet?**
8 **A Loxley always had regular appointments.**
9 **Q Right. Did you take him to his**
10 **appointments is what I mean?**
11 **A I usually got rides.**
12 **Q Okay.**
13 **A But Shaun would take me since it's his**
14 **brother-in-law.**
15 **Q Okay.**
16 **A And it was close to the house, too.**
17 **Q Okay.**
18 **A It's a small town where everybody knows**
19 **everybody, you know.**
20 **Q Uh-huh (affirmative).**
21 **A Shaun. What else? Oh. We went for**
22 **seafood once --**
23 **Q Okay.**
24 **A -- for lunch. I got my hair done and I**
25 **thought, you know, I really should push myself to go**

1 out with him.

2 Q Okay.

3 A And my hair -- I wasn't gonna go, but then
4 my hair stylist took a flat iron to it and made it
5 all -- she curled it with a flat iron.

6 Q Uh-huh (affirmative).

7 A And I thought it was really cute, so I
8 thought I should force myself to go out with him.

9 Q Okay.

10 A Went out for crab cakes.

11 Q Where'd you eat?

12 A Cooper's Seafood.

13 Q Okay.

14 A He was the only person I figured would be
15 around at, like, 2:00 or 3:00 in the afternoon who'd
16 want to go.

17 Q Yeah.

18 A He came and picked me up.

19 Q You also thanked Tyler Locke.

20 Have you met Tyler Locke in person?

21 A No, just a friend that I've written with.

22 Q Okay. So that's solely on World of
23 Warcraft?

24 A Yeah.

25 Q Okay.

1 A And, you know, with Skype sometimes we've
2 exchanged stories.

3 Q Okay.

4 A Like, I'll send him the document and read
5 over this or, hey, would you read over that for
6 me --

7 Q Okay.

8 A -- just to get some feedback on whether or
9 not something makes sense.

10 Q Okay.

11 A World of Warcraft friends, that's pretty
12 much what they are. They are just friends that I've
13 sent stuff to or proofread some small things for.

14 Q So same thing with Erin Honour?

15 A Erin, I met her. She lives around here.

16 Q Okay.

17 A I met her once for yogurt and -- yeah,
18 because we went to Yogi Mogli and then Mexican
19 food.

20 Q Does she live in Pennsylvania --

21 A No. She's --

22 Q -- or does she live in Atlanta?

23 A Atlanta.

24 Q Okay. When did you see Erin?

25 A Before all this happened. We were

1 supposed to get together again that Saturday. And
2 after I got out of jail, I had a bunch of missed
3 calls and texts from her.

4 Q Okay. Have you seen her since?

5 A No.

6 Q Okay.

7 A I still talk to her, though.

8 Q Okay. What about Garitt Hetrick?

9 A Just another friend that I exchange
10 writing with. He writes great villain characters.

11 Q Okay. Have you exchanged writing with him
12 since you've been back in Pennsylvania?

13 A Yeah.

14 Q Okay.

15 A I've sent him a few little things.

16 Q Okay. Have you been to any Christmas
17 parties this year?

18 A No.

19 Q Okay.

20 A I was supposed to go to one last Friday,
21 but I was too nervous about coming here to go.

22 Q Okay. What is it about coming to Georgia
23 that makes you the most anxious?

24 A Oh, gosh. This is gonna sound -- I don't
25 know how dumb this is gonna sound, but it's been in

1 my mind. Like, I've imagined people being upset
2 about the lawsuit and maybe trying to arrest me or
3 my mom, like, maybe plant something on us. And then
4 I've imagined my mother getting shot by the police
5 and then not coming back home and never seeing my
6 mom again or my friends and being back in that awful
7 DeKalb County.

8 Q Does Devon still live in Atlanta?

9 A Uh-huh (affirmative).

10 Q Does that cause you anxiety about coming
11 here?

12 A No. He wouldn't know I was coming here.
13 And I'm with my mother, so, like -- so, like, my
14 mother, if there was a problem, she'd call the
15 police maybe or something.

16 Q Okay. When's your next appointment with
17 Dr. Berger's office?

18 A December 29th.

19 Q Okay. How often --

20 What is the frequency of your appointments
21 with his office?

22 A I'm thinking it's every couple weeks.
23 They've scheduled a bunch. And they call two days
24 before, and my time won't allow me to go.

25 Q Okay.

1 A And I canceled the one last week. I
2 was -- just had a really bad panic after -- yeah. I
3 was so nervous about coming down here. I was afraid
4 I wouldn't be coming back home.

5 Q Okay. So Rebecca is Rebecca K-I-V-A-K
6 (spelling)?

7 A Yeah, Rebecca Kivak.

8 Q Who's Bill Novinski?

9 A He's my uncle.

10 Q Okay. What have you talked to him about?

11 A He's retired law enforcement, so he's been
12 kind of reassure -- trying to reassure me a bunch
13 that nobody's gonna come pulling me out of my bed at
14 night, things like that.

15 Q Okay.

16 A Because my mom's been getting frustrated,
17 so she has Uncle Bill call me sometimes at night and
18 talk to me. Like, pretty much they're telling me
19 that I'm illogical.

20 Q Do you have any other family members who
21 are law enforcement?

22 A No.

23 Q Just Bill?

24 A Yeah.

25 Q Where does -- where does Bill --

1 Where is Bill retired from?

2 **A He worked for The Pentagon.**

3 **Q Okay.**

4 **A And I believe he did some police work as**
5 **well.**

6 **Q Okay. And what has he told you?**

7 **A He's been just trying to tell me that I**
8 **should feel safe, that the -- you know, nobody's**
9 **gonna bother with this, you're not some drug**
10 **kingpin, it's forgotten about, sleep well and move**
11 **on with your life.**

12 **Q Okay.**

13 **A That's what everybody's been telling me,**
14 **but.**

15 **Q Who's Kristen?**

16 **A Kristen is my very best friend.**

17 **Q Okay.**

18 **A I met her when I was 11.**

19 **Q And does she live near you?**

20 **A She used to.**

21 **Q Okay.**

22 **A She used to live two blocks away.**

23 **Q Okay. Where does she live now?**

24 **A She lives in Drums --**

25 **Q Okay.**

1 **A** -- strangely enough, like --
2 **Q** But pretty close; right?
3 **A** -- two minutes away from where I was
4 living with my husband before we moved.
5 **Q** How far is Drums from your house now?
6 **A** 45 minutes or an hour.
7 **Q** When did you see Kristen last?
8 **A** Over the Summer.
9 **Q** Okay. And what did y'all do when you got
10 together?
11 **A** She came to my house on the 4th of July,
12 and she brought her baby.
13 **Q** Okay.
14 **A** I was supposed to go to her baby's
15 birthday party, but I didn't. I was --
16 **Q** Okay.
17 **A** That's too far.
18 **Q** And what have you talked to her about as
19 it relates to this lawsuit?
20 **A** Just how scared I am and I told her I am
21 so jealous of her that she's got a wonderful husband
22 and a baby and a house where she doesn't live with
23 her mother and she's not afraid to drive to the
24 store and she's got a teaching job like I thought I
25 was gonna have. She's an art teacher. And she's

1 moving on with her life, moving ahead, her and Jared
2 and --

3 Q Have you -- I'm sorry.

4 Have you looked into taking the Praxis II
5 since you've been back in Pennsylvania?

6 A Not yet.

7 Q Okay.

8 A And I'm, honestly, afraid because I've --
9 a lot of my anxiety, too -- well, aside from the
10 nightmares and stuff and stuff that triggers me,
11 it's, like, all the unanswered questions.

12 Q Okay. Like what?

13 A And, I mean, if I apply for a teaching job
14 and they see this, are they gonna haul me in front
15 of a panel of strangers and make me explain this and
16 relive all this again.

17 Q Have you talked to anyone about that to
18 get advice on that particular issue?

19 A Nobody knows. I don't know anybody
20 personally who's had any kind of arrest and gone on
21 to teach because I --

22 Q Do you think that's something you could
23 get advice from your attorney about?

24 A I don't think so.

25 Q Okay.

1 **A** **T2 **w**ant to be -- I don't want any more public
3 **h**umiliation. And, oh, god, I --**

4 **Q** Who's Dave Zannetti?

5 **A** **D**ave Zannetti is another friend from high
6 **s**chool that I also met when I was 15.

7 **Q** Okay. Where does he live?

8 **A** **H**e lives in Pittston.

9 **Q** Is that close?

10 **A** **Y**es.

11 **Q** Okay. How close?

12 **A** **M**aybe, like, ten minutes.

13 **Q** When's the last time you saw Dave?

14 **A** **O**ver the Summer.

15 **Q** Okay. And in what context did you see
16 Dave?

17 **A** **D**ave and his wife came over to hang out by
18 the pool with me.

19 **Q** Okay. Did y'all go anywhere?

20 **A** **N**o.

21 **Q** Okay. Then Dan Smeriglio, I think we
22 already talked about him; right?

23 **A** **O**h, wait. **D**ave? **D**ave was at my book
24 party.

25 **Q** Okay.

1 **A** I forgot Dave was at my --
2 **Q** Where was your book party?
3 **A** **At the casino.**
4 **Q** Okay. At Mohegan Sun?
5 **A** **Yeah.**
6 **Q** Okay.
7 **A** **I always pick that because it's close.**
8 **Q** Okay. Who came to your book party?
9 **A** **Joy and Joe --**
10 **Q** Okay.
11 **A** **-- my friends Dan and Karon. Dan's a**
12 **political blogger.**
13 **Q** Okay. Is Dan Dan Smeriglio?
14 **A** **No.**
15 **Q** Okay. What's Dan's last name?
16 **A** **Spack.**
17 **Q** Okay.
18 **A** **Ummmmmm, I'm trying to think of everybody.**
19 **Sorry. Everette, Rebecca, Ricky. Ricky's Rebecca's**
20 **boyfriend.**
21 **Q** Who's Everette?
22 **A** **Everette's somebody I'm maybe interested**
23 **in.**
24 **Q** Okay. How do you know Everette?
25 **A** **World of Warcraft. We wrote together, but**

1 I felt safer. I think anybody I meet, you know,
2 would be subjected to family and friends.

3 Q Okay.

4 A **After --**

5 Q So you invited him --

6 A **Yes.**

7 Q -- to the book party?

8 A **Yes.**

9 Q Was that the first time you'd met him in
10 person?

11 A **I talked to him around six months.**

12 Q Okay.

13 A **But he -- we wrote together.**

14 Q Okay.

15 A **And he's listened to me cry until 5:00 in**
16 **the morning, so I don't think he's gonna get**
17 **frustrated like a lot of other people have with**
18 **the --**

19 Q Okay. Have you been on any dates with
20 Everette?

21 A **When he was -- well, considering when he**
22 **was in. It was kind of the book party.**

23 Q Okay. Did y'all do anything else when he
24 was there for the book party?

25 A **Not really, just --**

1 Q Okay.

2 A We did watch a few movies.

3 Q Okay.

4 A But that's, like -- it's like I really
5 don't trust my own decision. So it's like anybody I
6 meet, they're meeting my family and friends; so I
7 can ask them if I'm doing something dumb.

8 Q Okay. Did they like Everette?

9 A They did.

10 Q Okay. Who else came to the book party?

11 A Ricky, Rebecca's boyfriend. Gosh.

12 They've been together over ten years.

13 Q How many people were there?

14 A Ten.

15 Q Okay.

16 A Me and Everette, Rebecca and Ricky.

17 Q And what did it involve? Did y'all have
18 dinner or?

19 A Some people wandered off to go have
20 dinner.

21 Q Okay.

22 A I ate beforehand.

23 Q Okay.

24 A Well, I -- well, I ate before people
25 arrived. I went to Pearl Sushi.

1 Q Okay. Who went with you to Pearl Sushi?

2 A Everette.

3 Q Okay.

4 A Everette had already been subjected to my
5 mother --

6 Q Okay.

7 A -- and father, so it was okay to be in
8 public at the casino.

9 Q Okay.

10 A Who else? Who else came? All right. Joy
11 and Joe, Rebecca and Ricky, Dan and Karon, and then
12 there was Dave and his wife Sam.

13 Q Okay.

14 A Oh, there were 11, my friend Duke.

15 Q Okay. Who's Duke?

16 A He is another political activist.

17 Q Okay.

18 A I know him as Duke Dallas. I know it
19 sounds ridiculous, but everybody calls him Duke.

20 Q Okay.

21 A But I've known him for years and years.
22 It's just kind of funny that --

23 I think his real name's Mark Barrett.
24 Nobody called him that.

25 Q Okay.

1 **A He's head of the Gas Drilling Awareness**
2 **Coalition.**

3 **Q Okay. When did you see Duke other than**
4 **your book party most recently?**

5 **A I hadn't seen Duke in over a year.**

6 **Q Okay.**

7 **A I saw Duke shortly after I came back.**

8 **Dan and Karon live about five minutes from**
9 **me.**

10 **Q Okay.**

11 **A So Dan and Karon and Duke came to -- Duke**
12 **picked me up and went to Dan and Karon's.**

13 **Q Okay.**

14 **A And I sat outside.**

15 **Q Okay. So what happened at your book**
16 **party? Did y'all meet in a room and have drinks?**
17 **I'm just kind of interested in what the party was**
18 **like.**

19 **A We met in front of the wine shop.**

20 **Q Okay.**

21 **A And from there we mostly spent our time at**
22 **the Center Bar because it's actually quieter.**

23 **Q Okay.**

24 **A Like, nobody really frequents it except,**
25 **like -- well, my friend Dave said it's, like, a**

1 hotspot for people with walkers.

2 Q Okay. And so what did you do as it
3 relates to your book? Did you give everybody a copy
4 or did -- what happened?

5 A It was more just going out and
6 celebrating, hey, I got something --

7 Q Okay.

8 A -- published finally. We talked about it
9 a little bit. Friends asked me questions.

10 Q Okay.

11 A My friends, most of them pretty much said
12 they wanted to pay for the book; so I didn't want to
13 bring copies, especially to a bar or a casino on
14 Halloween night.

15 Q Yeah.

16 A With intoxicated people, I didn't expect
17 copies to make it through the evening very well.

18 But it was more just celebrating my
19 birthday as well. It was my birthday as well and
20 Halloween and the book. I just threw all the
21 celebrating in one night --

22 Q Okay.

23 A -- and gave everybody some advance notice.

24 MS. COWAN: Okay. If we could take
25 just a really brief break for me to look

1 back over my notes, then I should be just
2 about finished.

3 MR. FILIPOVITS: Okay.

4 THE WITNESS: Okay.

5 (Whereupon, there was a recess
6 in the deposition from 2:53 to
7 3:09.)

8 BY MS. COWAN:

9 Q You've expressed some concern today about
10 the charges being refiled.

11 A **(Witness nods head affirmatively).**

12 Q Has anybody told you that that's a
13 possibility?

14 A **No. But the county I worked in before,**
15 **Luzerne County, is known for the Kids for Cash**
16 **scandal --**

17 Q Uh-huh (affirmative).

18 A **-- and government corruption.**

19 Q Uh-huh (affirmative).

20 A **So sometimes I think that, you know, maybe**
21 **if a politician wants to make a name for themselves**
22 **as D.A. and look tough on crime, they might not pay**
23 **attention to what actually happened and be like,**
24 **yeah, let's -- you know, I'll look real tough on**
25 **crime and haul this girl back from Pennsylvania and.**

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1 Q Okay.

2 A It's things like that.

3 Q Just a worry that's in your mind?

4 A Just a worry. And then, like, I worry
5 that I'll get pulled over and find out that there's,
6 like -- you know, that maybe the cop might see this
7 in my past record and be like, oh, I need numbers,
8 let me put some stuff on her car.

9 Q Put some stuff on her car? Like --

10 A Like, who knows, something he took from a
11 drug raid or something, like --

12 Q Okay.

13 A -- chuck it under my backseat --

14 Q Okay.

15 A -- and be like look what I found.

16 Q Okay.

17 A I come from a really corrupt county, so my
18 mind kind of works that way. I mean, after we had
19 judges getting kickbacks for sending kids to
20 juvenile hall, I -- different things are in the back
21 of my mind. And there's more corruption in the
22 county that went on than that, but that's the most
23 notable.

24 Q Okay. Do you recall Officer Gilbert's
25 testimony before the judge after your arrest and

1 stay in jail? Do you remember him talking to the
2 judge?

3 **A He recommended ROR and said I was**
4 **trustworthy.**

5 Q Okay. And did he indicate that you had
6 been cooperative in --

7 **A Yes.**

8 Q -- your arrest? Okay.

9 Do you still have Ativan pills that you
10 are able to take if you needed to? Do you still
11 have some left over from a prescription that you
12 had?

13 **A No. And they wanted to put me on more,**
14 **but they decided against it.**

15 Q Okay.

16 **A Because they look at it as antianxiety**
17 **medicine causing the whole thing.**

18 Q Okay.

19 **A And I'm, honestly, afraid to be on them**
20 **because -- this is why I've been using noncontrolled**
21 **substances because I'm afraid to be on them because**
22 **Pennsylvania now either has or they're pushing -- I**
23 **don't pay attention to politics like I used to.**
24 **They either have or they're pushing a list of people**
25 **who are on controlled substances for medication.**

1 Q Uh-huh (affirmative).

2 A And I was afraid with this charge in my
3 past, that they would possibly think that I was
4 doctor shopping and trying to get back on some kind
5 of medicine and have, like, a SWAT team raiding my
6 house in the middle of the night.

7 Q Do you know whether or not Prozac is a
8 controlled substance?

9 A The psychiatrist said it's not.

10 Q And what about the other one that you're
11 on?

12 A Prazosin, they said that is not as well.
13 This is what they've told me.

14 Q Okay. I took a look -- and you can show
15 these to your attorney, too. I took a look at your
16 World of Warcraft blog that -- are you --

17 You are emberglorious; is that right?

18 A Uh-huh (affirmative).

19 Q And your attorney had provided the link to
20 me in discovery responses, so I basically want you
21 to just flip through these things and tell me that
22 they are -- whether or not they're postings that you
23 made on your blog.

24 MS. COWAN: And I'm gonna label them
25 Exhibit 7.

DEPOSITION OF RENEE SCHROEDER BUTTS 12/18/2014
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1 THE WITNESS: Sure.

2 MS. COWAN: I think I might be out
3 of -- there it is. I am out of stickers,
4 Mary. Sorry.

5 (Thereupon, marked for identification
6 purposes, Defendant's Exhibit 7.)

7 BY MS. COWAN:

8 Q I'm gonna label them as a group like this,
9 but y'all can flip through and take a look.

10 A (Witness reviews document).

11 A Author Rambles. That's me.

12 MR. FILIPOVITS: I think just if any of
13 them aren't you, why don't we pull those
14 out.

15 MS. COWAN: Sure.

16 A Well, there's me and Becky at a birthday
17 party.

18 COURT REPORTER: I'm sorry. I didn't
19 hear you.

20 A I said, oh, there's me and Rebecca at a
21 birthday party, and then the same picture a bunch.

22 BY MS. COWAN:

23 Q Some of them didn't print out all the way.

24 A Yeah. I see that.

25 Q So they -- I did the best that I could.

1 **A (Witness reviews document).**

2 The Alfred Hitchcock quote. Well, things
3 like the Alfred Hitchcock quote were reblogged from
4 somebody else.

5 Q Okay. So you posted it after seeing --

6 **A Yeah. I reblogged it.**

7 Q Okay.

8 **A Yeah. Oh, there's the day I went for crab**
9 **cakes.**

10 Q With your hair curled?

11 **A Uh-huh (affirmative), yeah, and then**
12 **bikini pics. Everybody was posting bikini pics.**

13 COURT REPORTER: I'm sorry. I can't
14 hear you.

15 MR. FILIPOVITS: So --

16 THE WITNESS: I'm sorry. I'll shut up.

17 COURT REPORTER: No. I just need to be
18 able to hear you.

19 MS. COWAN: Tell her what you said.
20 You said bikini pics.

21 THE WITNESS: Oh. I said everybody was
22 kind of posting some bikini pics.

23 **A That was about dating. Finished.**

24 BY MS. COWAN:

25 Q Are those all you?

1 A Yeah.

2 Q Okay.

3 **A** Except for the one reblog thing.

4 Q Okay. I also noticed on the -- on the
5 same blog that you had a video of the ALS ice-bucket
6 challenge?

7 A Oh, yeah.

8 Q Who is that person that was in --

9 Did you know that person?

10 A Oh. It's another World of Warcraft
11 friend.

12 Q Oh, okay.

13 A I reblogged it for her to support her with
14 it.

15 Q Okay. Okay.

16 (Thereupon, marked for identification
17 purposes, Defendant's Exhibits 8 through 12.)

18 BY MS. COWAN:

19 Q I'm gonna show you some photographs. And
20 I've got extra copies here --

21 A Sure.

22 O -- for your attorney. These are mine.

23 These are -- I've labeled 'em 8 through 12, exhibits
24 8 through 12, and they're photographs of the pill
25 bottle, of Mr. Schroeder's pill bottle that was in

1 your purse. Exhibit 11 is a evidence sheet from the
2 police department. But I'm wondering, the pill
3 bottle -- and you can just take a look at these.
4 The pill bottle looked pretty chewed up.

5 **A Yes.**

6 Q Was it actually chewed up by --

7 **A The huskies.**

8 Q -- Ronald Reagan or?

9 **A I believe it was Vlad.**

10 Q Vladimir? Okay.

11 Do you recall the situation when they were
12 chewing on that pill bottle? Like, did you walk in
13 and find 'em with your medicine? How did that
14 happen?

15 **A I believe that happened with my husband.**

16 **I don't think I -- I don't think I was even home.**

17 Q Okay.

18 **A I think this happened fairly soon after he
19 had acquired them.**

20 Q Okay. So back in 2010 this pill bottle
21 got chewed?

22 **A Yes.**

23 Q Okay. Have you ever been to Weis
24 Pharmacy?

25 **A Weis Pharmacy? Yes.**

1 Q Okay. When have you been to Weis
2 Pharmacy?

3 A When I was living in Drums.

4 Q Okay. And what did you go there for?

5 A I went there to pick up my prescriptions
6 for Xyzal --

7 Q Okay.

8 A -- and the skin stuff --

9 Q Okay.

10 A -- and possibly Ativan. I'm trying to
11 figure out the dates, but I don't think so because I
12 was still at home, but he was -- in 2010? But he --
13 yeah. I think it's pretty much --

14 Q Did you start --

15 A I don't remember getting this off of Vlad.
16 I'm pretty sure it happened when I wasn't home.

17 Q Okay. And you started taking Ativan when
18 you were working for the commissioner; right?

19 A Yes.

20 Q Okay. And then continued on an as-needed
21 basis?

22 A Yeah.

23 Q Okay. Through about when do you think?

24 A I'm not sure. Like, after -- like, after
25 we moved, like, things calmed down and I wasn't that

1 **anxious.**

2 Q Once you moved --

3 A **That stuff lasted me for a while. Yeah.**

4 Q Okay.

5 A **I didn't take it much.**

6 Q Once you moved, were you able to take them
7 if you needed them in Greenville?

8 A **I took them very rarely.**

9 Q Okay. Did you have any conversations with
10 anyone at DeKalb County in the District Attorney's
11 office or anybody at the -- other than your stay at
12 the jail, anybody related to DeKalb County
13 government?

14 A **My dad called about why the mugshot was
15 still in -- in their system after the thing was
16 supposed to be expunged --**

17 Q Okay. Uh-huh (affirmative).

18 A **-- because more websites were picking it
19 up.**

20 Q Was that before you hired Mr. Filipovits?

21 A **No.**

22 Q Okay.

23 A **It was after.**

24 Q Okay.

25 A **I was pretty upset. Jeff remembers that,**

1 **I'm sure.**

2 **Q** So he talked -- he talked to somebody
3 there?

4 **A** **My dad called, yeah.**

5 **Q** Okay.

6 **A** **Dad was upset.**

7 **Q** Do you know who he talked to?

8 **A** **No idea.**

9 **Q** Okay.

10 **A** **Some lady. He doesn't even know who he**
11 **talked to --**

12 **Q** Okay. Okay.

13 **A** **-- when he did that.**

14 **Q** And was it taken down?

15 **A** **Not until after they fixed whatever was**
16 **wrong with the paperwork. I guess the paperwork got**
17 **lost between the D.A.'s office and somewhere else**
18 **because I got the notice of the expungement I**
19 **believe it was in late November, early December --**

20 **Q** Okay.

21 **A** **-- that they approved it, and then I saw**
22 **that somehow that one mugshot website that's still**
23 **available online that doesn't have my picture --**

24 **Q** Uh-huh (affirmative).

25 **A** **-- picked up that information later on in**

1 **December.**

2 Q Okay.

3 A And then my picture disappeared briefly
4 from -- well, Jeff figured out it was still on their
5 website, on the jail's website --

6 Q Okay.

7 A -- able to be picked up and proliferate
8 through the Internet.

9 Q And are you referring to the record
10 restriction notice that you received --

11 A **Yeah.**

12 Q -- from the D.A.'s office?

13 Was it this document right here?

14 A **(Witness reviews document). Yes.**

15 Q Okay.

16 A **It's been restricted from your criminal**
17 **history.**

18 Q Okay. Okay. I know you have plans to
19 write and work on your second book, which it sounds
20 like you've already done a good bit of work on.
21 It's just --

22 A **Yeah.**

23 Q -- you know, developing it for a
24 publisher; right?

25 A **Yeah.**

1 Q Okay. What about other writing or
2 employment aspirations that you have currently?

3 A I haven't aspired to do too much that
4 involves getting out of the house right now.

5 Q Okay.

6 A I'm trying at least to be okay for more
7 even recreational stuff --

8 Q Okay.

9 A -- than having to be somewhere possibly in
10 a noisy environment.

11 I would love to teach again. I don't know
12 if they'll take me with this on my record. It's a
13 bit of a problem, oh, hey, I'm gonna work with your
14 kids, I have a felony drug arrest in the past. I
15 mean, what are people gonna think. And then I don't
16 know if I -- I don't know how well I'd handle the
17 noise.

18 Q Okay.

19 A Because I get easily excited --

20 Q Uh-huh (affirmative).

21 A -- and nervous. It would be hard to work
22 with teenagers from early in the morning 'til
23 afternoon and then stay later. They're pretty
24 unpredictable --

25 Q Uh-huh (affirmative).

1 A -- if my student teaching was any
2 indication.

3 MS. COWAN: Okay. Okay. Okay. I
4 think that's all I have for you. Thank you
5 very much. I appreciate you being here.

6 THE WITNESS: Thank you.

7 (Thereupon, a discussion was
8 held off the record.)

9 (Whereupon, the deponent elected
10 to waive signature.)

11 (Deposition concluded at approximately 3:25 p.m.)

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DEPOSITION OF RENEE SCHROEDER BUTTS 12/18/2014
RENEE SCHROEDER vs. CALEB GILBERT

1 C E R T I F I C A T E
2

3 STATE OF GEORGIA:

4 NEWTON COUNTY:

5 I hereby certify that the foregoing transcript
6 was taken down, as stated in the caption, and the
7 questions and answers thereto were reduced to printing
8 under my direction; that the foregoing pages 1 through
9 252 represent a true and correct transcript, to the best
10 of my ability, of the evidence given upon said hearing,
11 and I further certify that I am not of kin or counsel to
12 the parties in the case; am not in the regular employ of
13 counsel for any of said parties; nor am I in anywise
14 interested in the result of said case.

15 Pursuant to Article 10.B. of the Rules and
16 Regulations of the Board of Court Reporting of the
17 Judicial Council of Georgia and OCGA 15-14-37 (a) and
18 (b), written disclosure is attached herein.

19 This, the 8th day of January, 2015.
20
21
22

23 MARY K. CALDWELL, CSR, B-1325
24 Certified Shorthand Reporter
25 and Notary Public.
Commission expires 3/21/17

DEPOSITION OF RENEE SCHROEDER BUTTS 12/18/2014
RENEE SCHROEDER vs. CALEB GILBERT

1 DISCLOSURE

2 STATE OF GEORGIA

3 COUNTY OF NEWTON:

4

5 DEPONENT: Renee Schroeder

6 Date of Deposition: December 18, 2014

7 Pursuant to Article 10.B. of the Rules and
8 Regulations of the Board of Court Reporting of the
9 Judicial Council of Georgia, I make the following
disclosure:

10 I am a Georgia Certified Court Reporter. I am
11 not disqualified for a relationship of interest under the
12 provisions of OCGA 9-11-28(c).

13 I am here as a representative of Precision
14 Reporting, Inc.

15 Precision Reporting, Inc., was contacted by
16 Attorney Amy Cowan to provide court reporting services
17 for this deposition.

18 Precision Reporting, Inc., will not be taking
19 this deposition under any contract that is prohibited by
20 Georgia law.

21

22

23

24 Mary K. Caldwell, CSR B-1325

25 Certified Shorthand Reporter
and Notary Public.

Commission expires 3/21/17